



F.0 FINAL ENVIRONMENTAL IMPACT REPORT

F.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) was prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code §21000 *et seq.*) and CEQA Guidelines (Title 14, California Code of Regulations, §15000 *et seq.*).

According to CEQA Guidelines §15132, the FEIR shall consist of:

- a. The Draft EIR (DEIR) or a revision of the draft;
- b. Comments and recommendations received on the DEIR either verbatim or in summary;
- c. A list of persons, organizations, and public agencies commenting on the DEIR;
- d. The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- e. Any other information added by the Lead Agency.

In accordance with the above-listed requirements, this FEIR for the proposed Roquet Ranch project (hereafter, the “Project”) and associated discretionary and administrative actions consists of the following:

1. Comment letters and responses to public comment; and
2. The circulated Roquet Ranch DEIR and Technical Appendices, SCH No. 2016061056 with additions shown as underline text and deletions shown as stricken text in Table F-2, *Errata Table of Additions, Corrections, and Revisions*.

This FEIR document was prepared in accordance with CEQA and the CEQA Guidelines and represents the independent judgment of the CEQA Lead Agency (City of Colton).

F.2 RESPONSES TO COMMENTS

CEQA REQUIREMENTS

CEQA Guidelines §15204(a) outlines parameters for submitting comments, and notes that the focus of review and comment of DEIRs should be:

...on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the



project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible... CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or suggested by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

CEQA Guidelines §15204(c) further advises that, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section §15064, an effect shall not be considered significant in the absence of substantial evidence.” CEQA Guidelines §15204(d) also notes that “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” CEQA Guidelines §15204(e) states that “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

Pursuant to CEQA Guidelines §15088(b), copies of the written responses shall be provided to commenting public agencies at least ten (10) days prior to certifying the FEIR. The responses shall be provided along with an electronic copy of this FEIR, as permitted by CEQA, and shall conform to the legal standards established for response to comments on DEIRs.

RESPONSES TO DEIR COMMENTS

CEQA Guidelines §15088 require the Lead Agency to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DEIR and to provide written responses to any substantive comments received. This Section provides all comments received on the DEIR, the City’s response to each comment, and a summary of revisions made to the DEIR as part of the FEIR in response to the various comment letters and to correct any errors.

Comment letters were received during the DEIR public review period which began on August 7, 2017 and closed on September 21, 2017. Seventeen (17) comment letters were received by the City of Colton regarding the DEIR for the proposed Project. A list of agencies, organizations, and persons that submitted comments regarding the DEIR is presented in Table F-1, *Organizations, Persons, & Public Agencies that Commented on the DEIR*. A copy of each comment letter and a response to each environmental issue raised in those letters is provided on the following pages. No comments submitted to the City of Colton on the DEIR have produced substantial new information requiring recirculation or additional environmental review under State CEQA Guidelines §15088.5.



Table F-1 Organizations, Persons, & Public Agencies that Commented on the DEIR

COMMENT LETTER	COMMENTING ORGANIZATION, PERSON, OR PUBLIC AGENCY	DATE
A	California Department of Toxic Substances Control (DTSC)	9/13/2017
B	California Department of Transportation (Caltrans) District 8	9/14/2017
C	California Native American Heritage Commission (NAHC)	9/5/2017
D	California Office of Planning and Research (OPR)	9/21/2017
E	South Coast Air Quality Management District (SCAQMD)	9/20/2017
F	County of San Bernardino Public Works	9/21/2017
G	City of Grand Terrace Planning and Development Services Department	9/21/2017
H	City of Riverside	9/21/2017
I	Anonymous Commenter	8/16/2017
J	Golden State Environmental & Social Justice Alliance	9/10/2017
K	Mobile Community Management Co. (Cadena Creek Mobile Home Park)	9/21/2017
L	Northside Improvement Association / Spanish Town Heritage Foundation / Springbrook Heritage Alliance	9/21/2017
M	Northside Improvement Association / Spanish Town Heritage Foundation / Springbrook Heritage Alliance / OSTA – Agua Mansa Chapter	9/21/2017
N	Old Spanish Trail Association	9/21/2017
O	Old Spanish Trail Association, Agua Mansa Chapter	9/21/2017
P	Old Spanish Trail Association, National Chapter	9/21/2017
Q	Riverside Historical Society	9/14/2017
R	San Manuel Band of Mission Indians	9/21/2017
S	Spanish Town Heritage Foundation	9/20/2017



LETTER A (Page 1 of 3)



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630



Edmund G. Brown Jr.
Governor



September 13, 2017

Mr. Mario Suarez, AICP
Senior Planner
Planning Division
City of Colton
650 North La Cadena Drive
Colton, California 92324
msuarez@ci.colton.ca.us

DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR ROQUET RANCH
SPECIFIC PLAN PROJECT (SCH# 2016061056)

Dear Mr. Suarez:

The Department of Toxic Substances Control (DTSC) has reviewed the subject EIR. The following project description is stated in the EIR: "The proposed Project consists of applications for General Plan Amendment, Specific Plan, Change of Zone, and a Phased Tentative Tract Map No. 19983. Approval of these applications would allow for development of the Project site with up to 450 Low Density single-family detached residential units on 60.2 acres; 293 Medium Density residential units on 19.2 acres; 131 High-Density residential townhome units on 6.0 acres; 1.2 acres of Neighborhood Commercial use; a 10.3-acre school site; a 0.8-acre fire station site; a 3.0-acre RV Parking Area; 19.3 acres of recreational open space; 199.7 acres of open space as resource preservation; and 16.5 acres of roadways."



Based on the review of the submitted document DTSC has the following comments:

1. The EIR should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. In addition, the EIR states that 10.3 acres of the project site will be used for a school. If state funding is anticipated, then DTSC review/approval is required pursuant to California Education Code. For school projects that do not require state funding, DTSC recommends environmental review under the DTSC school program oversight to ensure the school is safe for students and staff.

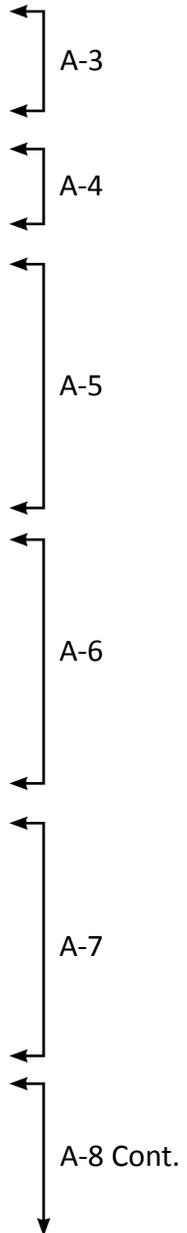
Printed on Recycled Paper



LETTER A (Page 2 of 3)

Mr. Mario Suarez
September 13, 2017
Page 2

2. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.
3. If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB).
4. The EIR states, "The existing Roquet Paving facility contains structures and other improvements that were constructed in the 1970s. Due to the age of these structures, there is a potential that asbestos containing materials (ACMs) are present in the buildings. If planned activities include building modifications/ demolitions, lead-based paints or products, mercury, and asbestos containing materials (ACMs) should be addressed in accordance with all applicable and relevant laws and regulations. In addition, evaluate whether polychlorinated biphenyls (PCBs) containing materials is present in onsite buildings and address as necessary to protect human health and the environment.
5. The EIR further states, "According to the Phase I ESA prepared for the Project site, portions of the site were historically used for agricultural purposes. Due to the timeframe of historical agricultural activities at the Project site (ceased prior to 1946), it is not likely that the soil at the site is impacted with organochlorine pesticides; as such, the Phase I ESA does not recommend conducting any soil sampling activities to evaluate the pesticide content of on-site soils." Though organochlorine pesticides may not be a concern, arsenic from arsenic based pesticides, used in the early 1900s, may be present in onsite soil. DTSC recommends investigation and mitigation if necessary to address potential arsenic impact.
6. The EIR states, "There is a potential that soil contamination could be present within or near the location of the four UST sites, which, absent mitigation, could result in potentially significant impacts during construction and operation of the Project site with respect to transport, use, or disposal of hazardous materials." DTSC is unable to evaluate whether vapor sampling and/or potential vapor intrusion risk was adequately addressed due to lack of relevant detailed information in the EIR. DTSC recommends soil gas sampling and vapor intrusion risk evaluation on sites with releases of volatile organic compounds (VOCs).
7. The EIR states that several areas of the site may have contaminated with hazardous substances/wastes. If soil contamination is suspected or observed in the project area, then excavated soil from the suspected area should be sampled prior to export/disposal. If the soil is contamination is suspected, it should be disposed of properly in accordance with all applicable and relevant laws and





LETTER A (Page 3 of 3)

Mr. Mario Suarez
September 13, 2017
Page 3

regulations. In addition, if the project proposes to import soil to backfill the excavated areas, proper evaluation and/or sampling should be conducted to make sure that the imported soil is free of contamination.

- 8. If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the EIR should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.

If you have any questions regarding this letter, please contact me at (714) 484-5380 or email at Johnson.Abraham@dtsc.ca.gov.

Sincerely,

Johnson P. Abraham
Project Manager
Brownfields Restoration and School Evaluation Branch
Brownfields and Environmental Restoration Program - Cypress

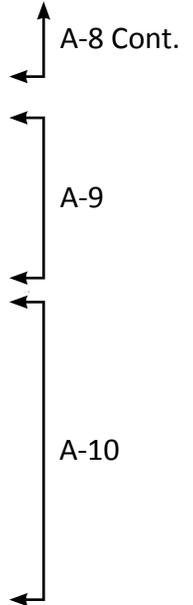
kl/sh/ja

cc: Governor's Office of Planning and Research (via e-mail)
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
State.clearinghouse@opr.ca.gov

Mr. Dave Kereazis (via e-mail)
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
Dave.Kereazis@dtsc.ca.gov

Mr. Shahir Haddad, Chief (via e-mail)
Schools Evaluation and Brownfields Cleanup
Brownfields and Environmental Restoration Program - Cypress
Shahir.Haddad@dtsc.ca.gov

CEQA# 2016061056





DTSC – Comment Letter A

A-1:

The commenter accurately summarizes the proposed Project. The City acknowledges the DTSC for their review and issuance of comments on the DEIR, and has provided responses to each of the agency's comments below.

A-2:

The information and analysis presented in DEIR Subsection 4.7, *Hazards and Hazardous Materials*, is based in part on a technical study that was prepared for the Roquet Ranch Project by Leighton and Associates, Inc. (hereafter, "LAI"), titled "Phase I Environmental Site Assessment, Roquet Ranch, Northwest and Southeast of 2699 Maryknoll Drive, APNs 1167-021-05, 1167-011-02 and Portions of 1167-011-01 and 1167-021-01, City of Colton, San Bernardino County, California" (dated January 22, 2015) and available as *Technical Appendix H* to the DEIR. The site-specific Phase I Environmental Site Assessment (ESA) conducted in accordance with the American Society for Testing and Materials (ASTM) E-1527-13 standard for conducting Environmental Site Assessments, and included a review of historical documents (aerial photographs, USGS topographic maps, and Sanborn Fire Insurance maps), previous environmental reports, and regulatory records, in addition to performing a site reconnaissance. The Phase I ESA fully evaluated the Roquet Paving Company facility and identifies several Recognized Environmental Conditions (RECs) associated with potential soil contamination at the Roquet Paving Company facility (located on the southeast portion of the site). Accordingly, a potentially significant direct impact is identified with respect to DEIR Subsection 4.7 Thresholds a and b related to the transport and/or disposal of hazardous materials during grading activities. Mitigation Measure MM 4.7-1 was identified and requires a Phase II soil investigation be submitted to the City prior to issuance of any demolition or grading permits. In the event that soil contamination is identified as part of the Phase II soil investigation, Mitigation Measure MM 4.7-1 requires the development and submittal of a treatment/remediation plan to bring soil contaminant levels within the local, State, and federal requirements for the proposed residential, commercial, and public/institution land uses in the Roquet Ranch Specific Plan. With implementation of Mitigation Measure MM 4.7-1, potential impacts identified with respect to DEIR Subsection 4.7 Thresholds a and b related to the transport and/or disposal of hazardous materials during grading activities would be reduced to a level below significance. Based on the foregoing, the DEIR adequately evaluated the potential for impacts associated with hazardous wastes/substances, and mitigates impacts related to this issue to a level below significance.

The commenter accurately states that Planning Area 12 is proposed as a 10.3-acre elementary school site with Medium Density Residential (MDR) as an alternative overlay use with a maximum of 165 dwelling units. The City recognizes that in the event that the Colton Joint Unified School District selects to develop a school facility within Planning Area 12, it would be required to seek all necessary approvals and/or oversight from the DTSC pursuant to the applicable provisions of the California Education Code.



A-3:

As discussed in the City's response to DTSC comment A-2, the site-specific Phase I ESA (*Technical Appendix H* to the DEIR) identified RECs associated with potential soil contamination at the existing on-site Roquet Paving Company facility located on the southeast portion of the Project site. Mitigation Measure MM 4.7-1 has been identified that would require that prior to the issuance of demolition or grading permits, a Phase II soil investigation would be performed with a report summarizing the results submitted to the City for approval. In the event that the Phase II soil investigation identifies soil contamination at the site, Mitigation Measure MM 4.7-1 would require the development and submittal of a treatment/remediation plan to bring soil contaminant levels within the local, State, and federal requirements for the proposed residential, commercial, and public/institution land uses in the Roquet Ranch Specific Plan. With implementation of Mitigation Measure MM 4.7-1, potential impacts related to the transport and/or disposal of hazardous materials during grading activities would be reduced to a level below significance. Based on the foregoing, the DEIR has sufficiently identified RECs at the Project site and provides mitigation measures that would reduce impacts related to this issue to a level below significance. Accordingly, no revisions have been made to the EIR in response to this comment.

A-4:

Pursuant to Santa Ana RWQCB and City of Colton regulatory requirements, the Project would be required to obtain a NPDES Municipal Storm Water Permit for construction activities. The NPDES permit is required for all projects that include construction activities, such as clearing, grading, and/or excavation which disturb at least one (1) acre of total land area. The requirement to obtain a NPDES permit is identified throughout the DEIR, including Table 3-6, *Matrix of Project Approvals/Permits*, of EIR Section 3.0, *Project Description*. As such, no revisions have been made to the EIR in response to this comment.

A-5:

The commenter correctly states that on page 4.7-6 of EIR Subsection 4.7, *Hazards and Hazardous Materials*, the EIR identifies the potential for asbestos containing materials (ACMs) and lead-based paint (LBP) to be present in the building materials that comprise the existing Roquet Paving Company facility located on the southeast portion of the Project site. The EIR states that because the Project would be subject to mandatory compliance with South Coast Air Quality Management District (SCAQMD) Rule 1403 as it relates to surveying and treatment of ACMs prior to and during demolition activities, potential impacts associated with emissions of ACMs would be less than significance. Additionally, the EIR also states that the demolition and construction phases of the Project would be required to comply with Title 17, California Code of Regulations (CCR), Division 1, Chapter 8 related to LBP. Mandatory compliance with Rule 1403 and Title 17 CCR, Division 1, Chapter 8 would ensure that impacts associated with ACMs and LBP would be reduced to a level below significance. Based on the foregoing, no revisions have been made to the EIR in response to this comment.

Although potential impacts associated with polychlorinated biphenyls (PCBs) are not explicitly discussed in EIR Subsection 4.7, *Hazards and Hazardous Materials*, the site-specific Phase I ESA states that no evidence of PCBs-containing equipment was observed at the Project site (LAI, 2015, p.



20). The Phase I ESA also does not identify any observations that would indicate mercury-containing equipment is present on-site. Therefore, no foreseeable impacts would occur related to mercury or PCBs, and no mitigation would be required.

A-6:

This comment accurately summarizes the conclusions of the DEIR and Phase I ESA (EIR *Technical Appendix H*) regarding organochlorine pesticides (OCPs) in soil. According to a Phase I ESA prepared for the 320-acre portion of the Project site that was historically used for agricultural purposes (includes Assessor Parcel Numbers [APNs] 1167-021-05, 1167-021-21, and portions of 1167-011-01 and 1167-021-01), a previous soil sampling investigation was conducted at the Project site by Mission Geoscience, Inc. in October 2001 which collected ten (10) soil samples along the west side of the Project site and one (1) soil sample near the southeast corner of the Project site. The soil samples were analyzed for Title 22 metals (includes arsenic), carbamate and urea agrochemicals, OCPs, organochlorine herbicides (OCHs), organophosphate herbicides (OPHs), and triazine herbicides. Additionally, a sample collected from a burn area was also analyzed for chlorinated dibenzo dioxins (CDDs) and chlorinated dibenzo furans (CDFs). According to the 2001 Phase I ESA, none of the soil samples that were analyzed contained concentrations of the substances listed above that exceeded the applicable regulatory screening levels intended to protect environmental and human health. Specifically, laboratory analytical results indicated that none of the soil samples collected from the Project site contained Title 22 metals (including arsenic) at concentrations exceeding California Human Health Screening Levels (CHHSLs) established by the California Office of Environmental and Health Hazard Assessment (OEHHA) or U.S. EPA Region IX Regional Screening Levels (RSLs) for the residential land use scenario. Additionally, the 2001 Phase I ESA does not identify arsenic impacts in soil as a REC, nor does it recommend additional testing of soils to further evaluate potential impacts from arsenic and OCPs in on-site soils. (LAI, 2014b, pp. 13-25)

As indicated in Table F-2, *Errata Table of Additions, Corrections, and Revisions*, two (2) Phase I ESA reports for the Project site that were not previously cited in the DEIR have been added to Section 7.0, *References*, of the EIR. Based on the foregoing discussion, no further revisions to the DEIR to evaluate the impacts of arsenic in on-site soils is warranted.

A-7:

The commenter's concerns regarding the potential need for evaluation of soil vapor impacts and soil vapor intrusion risk within the area of the former underground storage tanks (USTs) have been noted. As specified in the DEIR, all former USTs at the Project site were located at the current and former Roquet Paving Company facility. Mitigation Measure MM 4.7-1 requires that a qualified professional develop and conduct a Phase II soil investigation at the site of the current and former Roquet Paving Company facility in accordance with local, State, and federal regulations. The implementation of MM 4.7-1 would ensure that a determination is made as to whether soil vapor testing and/or evaluation of soil vapor intrusion risks are appropriate or necessary based on the requirements of local, State and federal regulations and the proposed residential land uses for the site. No revisions have been made to the EIR in response to this comment.



A-8:

Pursuant to Mitigation Measure MM 4.7-1, in the event that impacted soil is detected at the former or current Roquet Company paving facility as part of the required Phase II soil testing, a treatment/remediation plan would be developed and approved by the City to meet all applicable regulatory performance standards for the detected contaminant(s) prior to the issuance of a demolition permit or a grading permit. The treatment/remediation plan would specify the remediation method for impacted soils; in the event that excavation and disposal of impacted soil is deemed necessary, the soil shall be profiled and disposed of in accordance with all requirements established by the approved treatment/remediation plan, the selected off-site disposal facility, and all applicable local, State, and federal regulations. Similarly, the approved treatment/remediation plan required in Mitigation Measure MM 4.7-1 will be required to specify the sampling requirements applicable to any imported soil used to backfill the impacted soil excavations to ensure that imported soil is suitable for residential land use. No revisions have been made to the EIR in response to this comment.

A-9:

The only area of the site where demolition would occur is at the Roquet Paving Company facility. Pursuant to Mitigation Measure MM 4.7-1, in the event that impacted soil is detected at the paving facility as part of the required Phase II soil testing, a treatment/remediation plan would be developed and approved by the City prior to the issuance of a demolition permit or a grading permit. The treatment/remediation plan would specify the remediation method for impacted soils to meet all applicable regulatory requirements and performance standards; in the event that excavation and disposal of impacted soil is deemed necessary, the soil shall be profiled and disposed of in accordance with all requirements established by the approved treatment/remediation plan, the selected off-site disposal facility, and all applicable local, State, and federal regulations. Similarly, the approved treatment/remediation plan shall specify the sampling requirements applicable to any import soil used to backfill the impacted soil excavations to ensure that imported soil is suitable for residential land use. No revisions have been made to the EIR in response to this comment. For the remainder of the Project site where construction would occur, the 2001 Phase I ESA did not identify any soil contamination.

A-10:

The City of Colton acknowledges the contact information, and Mr. Abraham will be provided with a copy of the City's responses to the comments raised in this letter.



LETTER B (Page 1 of 2)

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
 DISTRICT 8
 PLANNING (MS 725)
 464 WEST 4th STREET, 6th FLOOR
 SAN BERNARDINO, CA 92401-1400
 PHONE: (909) 388-7017
 FAX: (909) 383-5936
 TTY: 711
 www.dot.ca.gov/dist8



*Making Conservation
 a California Way of Life.*



September 14, 2017

File: 08-SBd-215-PM 0.0/1.38

Mario Suarez
 Development Services Department
 City of Colton
 650 N. La Cadena Drive
 Colton, CA 92324

Subject: Roquet Ranch Specific Plan – Traffic Impact Analysis

Dear Mr. Suarez:

Thank you for providing the California Department of Transportation (Caltrans) the opportunity to review and comment on the Traffic Impact Analysis for the Roquet Ranch Specific Plan (Project), located west of La Cadena Drive and north of Center Street in the City of Colton. The project proposes to develop the 336.2-acre site with up to 1,050 residential dwelling units, 1.2 acres of neighborhood commercial use, 22.3 acres of recreational open space, 199.7 acres of open space, a 0.8-acre fire station site, and a 10.3-acre school site.

← B-1
 ←

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when proposed development may impact our facilities. As the responsible agency under the California Environmental Quality Act, it is also our responsibility to make recommendations to offset associated impacts with the proposed project. Although the project is under the jurisdiction of the City of Colton, due to the project's potential impact to the State facilities, including Interstate 10, Interstate 215, State Route 60, and State Route 91, it is also subject to the policies and regulations that govern the SHS. We offer the following comments:

← B-2
 ←

- 1) HOV lane should be included in the analysis.
- 2) Coordinate with San Bernardino County Transportation Authority (SBCTA) regarding I-215 and Barton Road interchange improvement project and this interchange project should be included in the analysis.
- 3) Provide the Truck PCE conversion methodology.

← B-3
 ← B-4
 ← B-5

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"



LETTER B (Page 2 of 2)

Mr. Suarez
September 14, 2017
Page 2

- 4) Provide queuing analysis of all movements at intersections #20, #22, #23, #24, #25, #26, #27, #28, and #29.
- 5) I-215 NB off ramp to E. La Cadena Drive and to Highgrove Place should be included in the analysis.
- 6) Provide the Synchro Version 8 files on a CD for review.
- 7) Provide the Traffic Signal Warrant Worksheets.
- 8) Improvements are to install a traffic signal at the Intersection of South Iowa/I-215 SB ramp (Intersection 27). This location is presently signalized. Also, upgrades are proposed at the signalized location of I-215/South Iowa Avenue ramp (Intersection 29). Proposed modifications or any additional upgrades must be submitted to Caltrans Encroachment Permits for review.

← B-6
← B-7
← B-8
← B-9
← B-10
← B-11
←

These recommendations are preliminary and summarize our review of materials provided for our evaluation. Please continue to keep us informed of the project and other future updates, which could potentially impact the SHS and interfacing transportation facilities. If you have any questions or need to contact us, please do not hesitate to contact Jacob Mathew at (909) 806-3928 or myself at (909) 383-4557.

Sincerely,

MARK ROBERTS
Office Chief
Intergovernmental Review, Community and Regional Planning

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"



California Department of Transportation (CALTRANS) – Comment Letter B

B-1:

The commenter accurately summarizes the proposed Project.

B-2:

The City acknowledges and understands CALTRANS' roles and responsibilities with respect to the Project. No revisions to the DEIR are required in order to respond to this comment.

B-3:

DEIR Section 4.14, *Transportation/Traffic*, and the supporting technical Traffic Impact Analysis (TIA) (*Technical Appendix L* of the DEIR) rely on analysis methodology contained in the San Bernardino County Congestion Management Program (CMP) *Guidelines for CMP Traffic Impact Analysis Reports* (Appendix "C", 2005 Update), the California Department of Transportation (CALTRANS *Guide for the Preparation of Traffic Impact Studies* (December 2002), and the Highway Capacity Manual (HCM) published by the Transportation Research Board. As directed by these reports, freeway analysis methodology requires analysis of traffic flow in the freeways' mixed-flow lanes. However, as stated in Chapter 11, Page 11-9 of the 2010 HCM (the most recent and current version of the HCM), the methodology for conducting an evaluation for basic freeway segments has several limitations in that it does not apply to or take into account special lanes reserved for single vehicle type, such as high-occupancy vehicle (HOV) lanes, truck lanes, and/or climbing lanes. For this reason, analysis of HOV lanes is not directed as part of HCM methodology, nor was an evaluation of HOV lanes requested by CALTRANS in their comment letter on the EIR's Notice of Preparation (NOP) dated July 18, 2016, and included as part of DEIR *Technical Appendix A*. Absent a published analysis methodology for HOV lanes, it is not possible to conduct a meaningful analysis that is informative under CEQA. No revisions to the DEIR are required in order to respond to this comment.

B-4:

The Project's Traffic Impact Analysis (TIA) (*Technical Appendix L* of the DEIR) utilized Alternative 7 of the *Interstate 215/Barton Road Interchange Improvement Project Revised Traffic Operations Analysis* (prepared by Iteris, Inc. and dated December 2011), which includes a roundabout at the I-215 southbound (SB) Ramp on Barton Road. The use of Alternative 7 in the TIA is consistent with the current Interstate 215/Barton Road interchange improvement project because the TIA incorporated the addition of a roundabout west of the Barton Road bridge at the southbound on- and off-ramps based on I-215/Barton Road Interchange plans that were published by San Bernardino County Transportation Authority prior to the preparation of the TIA. Therefore, the TIA took the projected modifications to the study area intersections into account that related to the I-215/Barton Road Interchange project and no revisions to the TIA or the DEIR are required in response to this comment.

B-5:

Analysis of the freeway mainline and ramp junctions in the Project's Traffic Impact Analysis (TIA) (*Technical Appendix L* of the DEIR) used actual vehicles. The HCS 2010 software translates the



volumes into passenger car equivalents (PCE) for the traffic modeling analysis (EIR Appendix L at Page 64). Therefore, no revisions to the DEIR or TIA are required.

B-6:

With the exception of Intersections #20 and #25, the Project's TIA provides queuing analyses for all of the intersections listed in this comment and included them in the technical appendices of the TIA. Information regarding queues at intersections #20 and #25 are located within the Synchro files (see response to comment B-8 regarding Synchro file data), which meets the Commenter's request for the queuing data related to intersections #20 and #25. The Project's impacts associated with intersections #20 and #25 are disclosed throughout DEIR Subsection 4.14, Transportation and Traffic including the potentially significant impacts to intersection #20.

B-7:

DEIR Subsection 4.14, *Transportation and Traffic*, and the supporting Traffic Impact Analysis (*Technical Appendix L* of the DEIR) do not analyze I-215 northbound ramps to East La Cadena Drive and to Highgrove Place because the Project is not calculated to contribute any trips to these intersections. Thus, no revisions to the DEIR or TIA are warranted with respect to this comment.

B-8:

The City sent a digital copy of the Synchro (Version 8) files to CALTRANS on a CD per the commenter's request as part of the Final EIR distribution to Caltrans. Note that the analysis was performed using Synchro Version 9 and may not show the same results using Version 8. The Synchro Version 9 software represents a more recent version of the modeling software, which incorporates several updates, bug fixes and corrections when compared to Version 8; therefore, it represents a more accurate method of modeling. No revisions to the DEIR or TIA are warranted with respect to this comment.

B-9:

Traffic signal warrant analysis worksheets are provided for all analysis scenarios in the technical appendices of the Traffic Impact Analysis(TIA) (*Technical Appendix L* of the DEIR). The City sent a digital copy of Worksheets to Caltrans on a CD per the commenter's request as part of the Final EIR distribution to Caltrans. No revisions to the DEIR or TIA are warranted with respect to this comment.

B-10:

The City acknowledges CALTRANS' comment that any modifications to the currently signalized I-215/South Iowa Avenue ramp (#29) shall be submitted to CALTRANS for review. No revisions to the DEIR or TIA are warranted with respect to this comment.

B-11:

The City of Colton acknowledges the contact information, and will reach out to CALTRANS with any substantive Project updates and/or questions that may affect the State Highway System.



LETTER C (Page 1 of 5)

STATE OF CALIFORNIA
NATIVE AMERICAN HERITAGE COMMISSION
 Environmental and Cultural Department
 1550 Harbor Blvd., Suite 100
 West Sacramento, CA 95691
 Phone (916) 373-3710

Edmund G. Brown Jr., Governor



September 5, 2017

Mario Suarez
 City of Colton
 659 North La Cadena Drive
 Colton, CA 92324

sent via e-mail: msuarez@coltonca.gov

Re: SCH# 2016061056, Roquet Ranch Specific Plan Project, City of Colton; San Bernardino County, California

Dear Mr. Suarez:

The Native American Heritage Commission (NAHC) has reviewed the Draft Environmental Impact Report prepared for the project referenced above. The review included the Executive Summary, the Introduction and Project Description, and the Environmental Analysis, section 4.4 Cultural Resources prepared by Brian F. Smith & Associates, Inc. for the City of Colton. We have the following concerns:

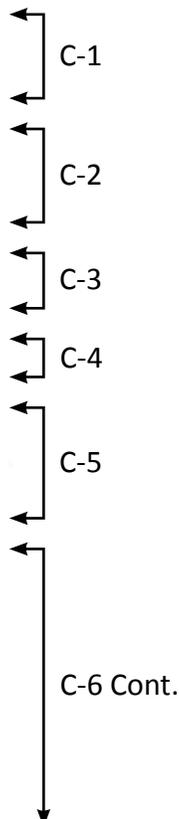
1. There are no mitigation measures specifically addressing Tribal Cultural Resources separately and distinctly from Archaeological Resources. Mitigation measures must take Tribal Cultural Resources into consideration as required under AB-52, **with or without consultation** occurring. For sample mitigation measures, please refer to California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf>
2. Mitigation language for archaeological resources is not always appropriate for or similar to measures specifically for handling Tribal Cultural Resources. The only references in the proposed mitigation is for "collection, data recovery, and curation".
3. There is no provision for the Native American Monitor to stop work when a possible find is made. The Native American Monitor should have the same stop-work rights as the Archaeological Monitor.

The California Environmental Quality Act (CEQA)¹, specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.² If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared.³ In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended in 2014 by Assembly Bill 52. (AB 52).⁴ **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** AB 52 created a separate category for "tribal cultural resources", that now includes "a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment."⁵ Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.⁷ Your project may also be subject to **Senate Bill 18 (SB 18)** (Burton, Chapter 905, Statutes of 2004), Government Code 65352.3, if it also involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space. **Both SB 18 and AB 52 have tribal consultation requirements.** Additionally, if your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966⁸ may also apply.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

¹ Pub. Resources Code § 21000 et seq.
² Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b); CEQA Guidelines Section 15064.5 (b)
³ Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1); CEQA Guidelines § 15064 (a)(1)
⁴ Government Code 65352.3
⁵ Pub. Resources Code § 21074
⁶ Pub. Resources Code § 21084.2
⁷ Pub. Resources Code § 21084.3 (a)
⁸ 154 U.S.C. 300101, 36 C.F.R. § 800 et seq.





LETTER C (Page 2 of 5)

Agencies should be aware that AB 52 does not preclude agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52. For that reason, we urge you to continue to request Native American Tribal Consultation Lists and Sacred Lands File searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>. Additional information regarding AB 52 can be found online at http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf, entitled "Tribal Consultation Under AB 52: Requirements and Best Practices".

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.

A brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments is also attached.

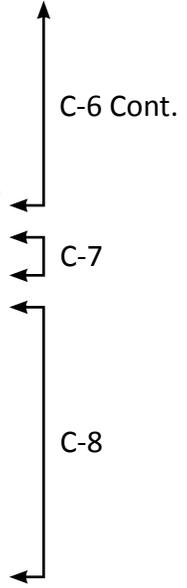
Please contact me at gayle.totton@nahc.ca.gov or call (916) 373-3710 if you have any questions.

Sincerely,


Gayle Totton, B.S., M.A., Ph.D
Associate Governmental Project Analyst

Attachment

cc: State Clearinghouse





LETTER C (Page 3 of 5)

Pertinent Statutory Information:

Under AB 52:

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice.

A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project⁹ and **prior to the release of a negative declaration, mitigated negative declaration or environmental impact report**. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18)."¹⁰

The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects.¹¹

1. The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.

If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency.¹²

With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process **shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10**. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.¹³

If a project may have a significant impact on a tribal cultural resource, **the lead agency's environmental document shall discuss both of the following:**

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource.¹⁴

Consultation with a tribe shall be considered concluded when either of the following occurs:

- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
- b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.¹⁵

Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable.¹⁶

If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, **the lead agency shall consider feasible mitigation** pursuant to Public Resources Code section 21084.3 (b).¹⁷

An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:

- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
- b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.

⁹ Pub. Resources Code § 21080.3.1, subds. (d) and (e)

¹⁰ Pub. Resources Code § 21080.3.1 (b)

¹¹ Pub. Resources Code § 21080.3.2 (a)

¹² Pub. Resources Code § 21080.3.2 (a)

¹³ Pub. Resources Code § 21082.3 (c)(1)

¹⁴ Pub. Resources Code § 21082.3 (b)

¹⁵ Pub. Resources Code § 21080.3.2 (b)

¹⁶ Pub. Resources Code § 21082.3 (a)

¹⁷ Pub. Resources Code § 21082.3 (a)

C-9 Cont.



LETTER C (Page 4 of 5)

- c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days.¹⁸
This process should be documented in the Tribal Cultural Resources section of your environmental document.

Under SB 18:

Government Code § 65352.3 (a) (1) requires consultation with Native Americans on general plan proposals for the purposes of "preserving or mitigating impacts to places, features, and objects described § 5097.9 and § 5091.993 of the Public Resources Code that are located within the city or county's jurisdiction. Government Code § 65560 (a), (b), and (c) provides for consultation with Native American tribes on the open-space element of a county or city general plan for the purposes of protecting places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code.

- SB 18 applies to **local governments** and requires them to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf
- **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.**¹⁹
- **There is no Statutory Time Limit on Tribal Consultation under the law.**
- **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research,²⁰ the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction.²¹
- **Conclusion Tribal Consultation:** Consultation should be concluded at the point in which:
 - The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation.²²

NAHC Recommendations for Cultural Resources Assessments:

- **Contact the NAHC for:**
 - A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - A Native American Tribal Contact List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
 - The request form can be found at <http://nahc.ca.gov/resources/forms/>.
- **Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search.** The records search will determine:
 - If part or the entire APE has been previously surveyed for cultural resources.
 - If any known cultural resources have been already been recorded on or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- **If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.**
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

C-9 Cont.

C-10

¹⁸ Pub. Resources Code § 21082.3 (d)

¹⁹ (Gov. Code § 65352.3 (a)(2)).

²⁰ pursuant to Gov. Code section 65040.2,

²¹ (Gov. Code § 65352.3 (b)).

²² (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).



LETTER C (Page 5 of 5)

Examples of Mitigation Measures That May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:

- o Avoidance and preservation of the resources in place, including, but not limited to:
 - Planning and construction to avoid the resources and protect the cultural and natural context.
 - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
- o Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - Protecting the cultural character and integrity of the resource.
 - Protecting the traditional use of the resource.
 - Protecting the confidentiality of the resource.
- o Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
- o Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed.²³
- o Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated.²⁴

The lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.

- o Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources.²⁵ In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
- o Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
- o Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subs. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

C-11

²³ (Civ. Code § 815.3 (c)).

²⁴ (Pub. Resources Code § 5097.981).

²⁵ per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)).



Native American Heritage Commission (NAHC) – Comment Letter C

C-1:

The comment describes the NAHC’s review of the Draft Environmental Impact Report (DEIR) and provides a summary of the NAHC’s comments. Responses to NAHC’s comments are provided below.

C-2:

As part of the AB 52 consultation processes required by State law, the City of Colton sent notification of the proposed Project on June 1, 2016 to the Native American tribes with possible traditional or cultural affiliation to the area that previously requested consultation pursuant to AB 52 requirements. The City received responses from the San Manuel Band of Mission Indians and the Agua Caliente Band of Cahuilla Indians. In their response to the City’s notification of the Project, the Agua Caliente Band of Cahuilla Indians deferred to the San Manuel Band of Mission Indians and concluded their participation in the AB 52 consultation on August 25, 2016. The City sent a notification to the San Manuel Band of Mission Indians indicating that it had made a reasonable effort to consult with the San Manuel Band of Mission Indians and was concluding the consultation on July 25, 2017. Neither the San Manuel Band of Mission Indians nor the Agua Caliente Band of Cahuilla Indians identified any specific significant tribal cultural resources at the Project site pursuant to CEQA Statute § 21074(a). In response to the DEIR, the San Manuel Band of Mission Indians provided a comment letter (Comment Letter R of this Final EIR) requesting further consultation. As a result of this request, the City is continuing communication with the San Manuel Band of Mission Indians in relation to the Project including meeting with the representatives of the Tribe during the preparation of this Final EIR. However, because no significant tribal cultural resources were identified at the site during consultation efforts prior to the publication of the DEIR and through the field survey and literature review conducted pursuant to the preparation of the cultural resources report, it was determined that the Project would not result in significant impacts associated with tribal cultural resources. Although no significant impacts to Tribal Cultural Resources were identified at the Project site during the consultation process, in an abundance of caution, Mitigation Measure MM 4.4-2 requires the Project Applicant to develop and implement an Archeological Monitoring Program and Data Recovery Protocol that would require a full-time Native American monitor be retained in addition to a qualified archaeologist to be present during ground disturbance and grading activities. Implementation of MM 4.4-2 would preclude significant impacts to previously unidentified subsurface tribal cultural resources during grading activities should they be discovered during Project-related ground disturbance and grading.

Moreover, the Cultural Resources Assessment performed at the Project site by Brian F. Smith and Associates (BFSA; EIR *Technical Appendix F1*) identified two (2) archaeological resources that meet the definition of a significant resource under CEQA that would be physically impacted by implementation of the Project: Site SBR-29,034 and Site SBR-29,037. Implementation of Mitigation Measures MM 4.4-1 and MM 4.4-3 impose temporary construction fencing requirements, other avoidance measures, and recordation of cultural resource easements for the protection of sites SBR-29,034 and SBR-29,037, which would reduce the Project’s impacts to these resources to a level below significance.



Based on the foregoing, no revisions have been made to the EIR in response to this comment.

C-3:

Because no significant tribal cultural resources were identified at the Project site, the DEIR concluded that the Project would have no impact on tribal cultural resources. However, in an abundance of caution, Mitigation Measure MM 4.4-2 has been imposed and requires that a full-time Native American monitor be retained to be present at the Project site throughout grading activities. Additionally, Mitigation Measure MM 4.4-2 has been revised in the Final EIR to explicitly state that in the event that a potentially significant tribal cultural resource is inadvertently discovered, the Native American monitor shall have the authority to divert or temporarily halt excavation activities in the area of the discovery to allow for the evaluation of the potentially significant tribal cultural resource(s). The Native American monitor will be responsible for the transmittal and disposition of any potentially significant tribal cultural resources which would ensure that such resources, if found, are handled appropriately. This revision is summarized in Table F-2, *Errata Table of Additions, Corrections, and Revisions*. No additional changes were made in the Final EIR beyond the revisions to Mitigation Measure MM 4.4-2 that are discussed below.

C-4:

The City acknowledges NAHC's comment that the Native American monitor should have the same stop-work rights as the certified archaeological monitor. As such, the City has revised subpart 6 of Mitigation Measure MM 4.4-2 in the Final EIR to state that in the event that a potentially significant tribal cultural resource is inadvertently discovered, the Native American monitor shall have the authority to divert or temporarily halt ground disturbance operation in the area of the discovery to allow for the evaluation of potentially significant tribal cultural resources. This revision is summarized in Table F-2, *Errata Table of Additions, Corrections, and Revisions*.

C-5:

The City acknowledges that pursuant to CEQA requirements, if the Project would cause a substantial adverse change in the significance of a historical resource, then it may have a significant impact on the environment. The Cultural Resources Assessment performed at the site by BFSa (EIR *Technical Appendix F1*) identified three (3) potentially significant historic resources on the Project site; however, none of the historic resources were determined to be significant under CEQA. No other significant historic resources are present on the Project site or within the off-site improvement areas; therefore, the Project would not cause a substantial adverse change in the significance of a historical resource as defined in California Code of Regulations § 15064.5 and impacts would be less than significant with no mitigation required. Based on the foregoing, no revisions have been made to the EIR in response to this comment.

C-6:

The City acknowledges the information that the commenter provided regarding Assembly Bill 52 (AB 52). Because the Project entailed a Notice of Preparation (NOP) filed after July 1, 2015, AB 52 is applicable to the Project. Additionally, because the Project entails a General Plan Amendment and



Specific Plan, SB 18 is also applicable to the Project. As part of the AB 52 consultation processes required by State law, the City of Colton sent notification of the proposed Project on June 1, 2016 to the Native American tribes with possible traditional or cultural affiliation to the area that previously requested consultation pursuant to AB 52 requirements. The City received responses from the San Manuel Band of Mission Indians and the Agua Caliente Band of Cahuilla Indians. In their response to the City's notification of the Project, the Agua Caliente Band of Cahuilla Indians deferred to the San Manuel Band of Mission Indians and concluded their participation in the AB 52 consultation on August 25, 2016. The consultation with the San Manuel Band of Mission Indians was concluded on July 25, 2017. Neither the San Manuel Band of Mission Indians nor the Agua Caliente Band of Cahuilla Indians identified any specific significant tribal cultural resources at the Project site pursuant to CEQA statute § 21074(a). The City of Colton has completed mandatory compliance with Public Resources Code § 21074 associated with the environmental review of the proposed Project and no significant tribal cultural resources have been identified. Accordingly, it was determined that the Project would result in no impact to tribal cultural resources. Nevertheless, in an abundance of caution, Mitigation Measure MM 4.4-2 has been imposed to preclude significant impacts to any inadvertently discovered subsurface tribal cultural resources during grading activities. Based on the foregoing, no revisions have been made to the EIR in response to this comment.

C-7:

The City acknowledges that the commenter provided pertinent statutory information from AB 52 and SB 18, and provided their recommendations for conducting cultural resource assessments.

C-8:

The City of Colton acknowledges the contact information, and will contact the NAHC with any further questions, if necessary.

C-9:

The City acknowledges that the commenter provided pertinent statutory information from AB 52 and SB 18. As discussed in the City's response to NAHC Comment C-6, the City has completed mandatory compliance with Public Resources Code § 21074 and SB 18 associated with the environmental review of the proposed Project and no significant tribal cultural resources have been identified. The City complied with SB 18 by sending notification of the Project to the Native American Heritage Commission (NAHC), which responded to City staff on May 20, 2016 with a letter that included a Native American tribal consultation list. Letters in compliance with SB 18 were sent to the Native American tribes included on the list in June 2016 requesting information related to cultural resources within the Project site. Accordingly, no further actions are required of the City or the Project Applicant to complete compliance with the provisions of AB 52 or SB 18. Based on the foregoing, no revisions have been made to the EIR in response to this comment.

C-10:

The City of Colton acknowledges that the commenter provided their recommendations for Cultural Resources Assessments. The Cultural Resources Assessment prepared for the Project (included as EIR



Technical Appendix C1) generally followed the NAHC's recommendations, including: conducting a Sacred Lands File (SLF) search, conducting an archaeological records search through the California Historical Research Information System (CHRIS) Center, and preparation of a professional report detailing the findings and recommendations of the records search and field survey(s). Based on the foregoing, no revisions have been made to the EIR in response to this comment.

C-11:

The City of Colton acknowledges that the commenter provided examples of mitigation measures that may be considered to avoid or minimize significant adverse impacts to tribal cultural resources. As stated in the above responses to the NAHC's comments, the implementation of Mitigation Measures MM 4.4-1 through MM 4.4-3 would reduce any potential impacts to archaeological resources, including impacts related to the inadvertent discovery of subsurface tribal cultural resources, to a level below significance. No revisions have been made to the EIR in response to this comment.



LETTER D (Page 1 of 2)



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

September 19, 2017

Mario Suarez
City of Colton
639 N. La Cadena Drive
Colton, CA 92324

Subject: Roquet Ranch Specific Plan
SCH#: 2016061056

Dear Mario Suarez:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 18, 2017, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.npr.ca.gov



D-1 Cont.



LETTER D (Page 2 of 2)

Document Details Report
State Clearinghouse Data Base

SCH# 2016061056
Project Title Roquet Ranch Specific Plan
Lead Agency Colton, City of

Type EIR Draft EIR

Description The project proposes to develop a 336.2-acre site with 450 low density detached single family residential units, 293 medium density residential units on 19.2 acres; 131 high density residential townhome units on 6.0 acres; 1.2 acres of neighborhood commercial use; a 10.3-acre school site; a 0.8 acre fire station site; 19.3 acres of recreational open space; 199.7 acres of open space as resource preservation; and 16.5 acres of roadways. Beneficiaries of the project commercial retail tenants, future users of the projects recreational amenities, and future recipients of the fire protection services that would be offered by the proposed fire station site.

Lead Agency Contact

Name Mario Suarez
Agency City of Colton
Phone (909) 370-5523 **Fax**
email
Address 659 N. La Cadena Drive
City Colton **State** CA **Zip** 92324

Project Location

County San Bernardino
City
Region
Lat / Long 34° 01' 44.7" N / 117° 20' 07.6" W
Cross Streets La Cadena Dr and Maryknoll Dr
Parcel No. 116-701-101
Township 2S **Range** 4W **Section** 6 **Base** SB

Proximity to:

Highways I-215, SR 91, 60
Airports
Railways SPRR/ATSF
Waterways Santa Ana River, Highgrove Channel
Schools Mult
Land Use

Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 6; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 8; Department of Housing and Community Development; Regional Water Quality Control Board, Region 8; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received 08/04/2017 **Start of Review** 08/04/2017 **End of Review** 09/18/2017

D-1 Cont.



State Clearinghouse – Comment Letter D

D-1:

The City of Colton acknowledges the commenter's letter indicating that the proposed Project has complied with the State Clearinghouse review requirements for draft environmental documents. This letter denotes a public review period for State agencies spanning from August 4, 2017 to September 18, 2017; however, it should be noted that the City of Colton's DEIR public review period occurred between August 7, 2017 and September 21, 2017.

This letter also forwarded the comment letters received by the State Clearinghouse from the DTSC and NAHC. The responses to these letters have been provided under Comment Letter A and Comment Letter C, respectively

LETTER E (Page 1 of 4)



SENT VIA E-MAIL AND USPS:

September 20, 2017

msuarez@coltonca.gov

Mario Suarez, Planning Manager
City of Colton – Development Services Department
650 N. La Cadena Drive
Colton, CA 92324

**Draft Environmental Impact Report (Draft EIR) for the Proposed
Roquet Ranch Specific Plan (SCH: 2016061056)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

E-1

SCAQMD’s 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD’s Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP¹ is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin (Basin). Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the Basin. The most significant air quality challenge in the Basin is to reduce an additional 45 percent reduction in NOx emissions in 2023 and an additional 55 percent reduction in NOx emissions beyond 2031 levels for ozone attainment.

E-2

SCAQMD Staff’s Summary of Project Description

The Lead Agency proposes to construct 874 residential units, a 10.3-acre school, a 0.8-acre fire station, 1.2 acres of commercial uses, 219 acres of open space, and 16.5 acres of roadways on 336.2 acres (Proposed Project). Based on a review of aerial photographs, SCAQMD staff found that the Proposed Project would locate residential land uses less than 300 feet away from Interstate 215. Construction is expected to begin in 2017 and be completed in late 2020. Construction and operational activities are expected to overlap.

E-3

SCAQMD Staff’s Summary of Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Section, the Lead Agency quantified the construction and operational emissions and compared them to SCAQMD’s regional and localized air quality CEQA significance thresholds to determine the significance of air quality impacts. The Lead Agency found that after incorporating mitigation measure (MM) 4.2-1, the Proposed Project would exceed SCAQMD’s regional air quality CEQA significance thresholds for VOC, NOx, and CO

E-4 Cont.

¹ South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Available at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.



LETTER E (Page 2 of 4)

Mario Suarez

2

September 20, 2017

when the construction phase overlaps with operational activities². The Lead Agency performed a HRA and found that the Maximum Exposed Individual Resident cancer risk would be 6.44 in one million which is below SCAQMD’s CEQA significance threshold of 10 in one million for cancer risk³.

↑
E-4 Cont.
←

General Comments

SCAQMD staff has concerns about the HRA analysis in the Draft EIR. The HRA analysis used assumptions which have likely led to an under-estimation of the Proposed Project’s health risk impacts. Details are included in the attachment. As described in the 2016 AQMP, achieving NOx emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. Therefore, SCAQMD staff recommends changes to the existing MM 4.2-1 and a new mitigation measure to further reduce significant NOx emissions during the overlapping construction and operational phases. Please see the attachment for more information.

←
E-5
←

Pursuant to the California Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR. SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Ryan Bañuelos, Air Quality Specialist, CEQA Section, at (909) 396-3479, if you have any questions on the comment.

←
E-6
←
E-7
←

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC:RB

SBC170808-02

Control Number

² Draft EIR, Appendix B, *Roquet Ranch Specific Plan Air Quality Impact Analysis*. The Lead Agency stated that “it is impossible to determine which portions of the Project site would be operational while other portions of the Project site would be under construction. Therefore, the Air Quality Impact Analysis included a conservative evaluation of a worst-case scenario that models air quality impacts of the Project if the construction and operational phases were to fully overlap. In reality, the overlap scenario modeled by the Project’s Air Quality Impact Analysis would not occur, as it assumes the Project would be fully operational during construction activities. Thus, the analysis is conservative and overstates the Project’s air quality impacts.”

³ Draft EIR, Appendix C, *Roquet Ranch Specific Plan Air Toxic and Criteria Pollutant Health Risk Assessment*. Table 5-1.



LETTER E (Page 3 of 4)

Mario Suarez

3

September 20, 2017

ATTACHMENT

Health Risk Assessment (HRA) Analysis

1. In the HRA, the Lead Agency used the mean breathing rates to calculate a weighted average breathing rate. Consistent with SCAQMD’s Risk Assessment Procedures⁴, SCAQMD staff recommends that the Lead Agency use the 95th percentile breathing rates and the other parameters such as fraction of time at home, exposure frequency, and age specific factor for each corresponding age bin (i.e. emissions from Year 1 of project operation should be used to estimate cancer risks to the third trimester to 0 year age bin; Year 1 and 2 of project operation should be used to estimate the cancer risks to the 0 to 2 years age bins; and so on)..

E-8

Mitigation Measures

2. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant impacts. To further reduce the significant NOx emissions during the overlapping phases, SCAQMD staff recommends the following changes to MM 4.2-1 and a new mitigation measure (MM) 4.2-2 that the Lead Agency should include in the Final EIR. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD’s CEQA Air Quality Handbook website⁵.

E-9

Recommended Changes to the Existing Mitigation Measure (MM) 4.2-1

MM 4.2-1: Prior to issuance of grading permits, the City of Colton Building Official or his/her designee shall ensure that grading plans include a note that specifies that that all construction equipment greater than 150 horsepower is California Air Resources Board (CARB) Tier 34 Certified or better. The Grading Contractor shall be responsible for ensuring compliance with this note throughout the duration of grading activities.

E-10

Recommended New Mitigation Measure (MM) 4.2-2

MM 4.2-2: Require the use of 2010 model year diesel haul trucks that conform to 2010 EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export), and if the Lead Agency determines that 2010 model year or newer diesel haul trucks cannot be obtained, the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc. during the construction period.

E-11

⁴ South Coast Air Quality Management District. August 8, 2017. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf?sfvrsn=4.

⁵ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa>.



LETTER E (Page 4 of 4)

Mario Suarez

4

September 20, 2017

Compliance with SCAQMD Rule 403(e) – Large Operations

3. The Proposed Project is a large operation on 336.2 acres (50 acres or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin. The Lead Agency is required to comply with SCAQMD Rule 403(e) – Additional Requirements for Large Operations⁶. The requirements may include, but are not limited to, Large Operation Notification (Form 403 N), appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class⁷. Therefore, SCAQMD recommends that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 403(e) in the Final EIR.

E-12

⁶ South Coast Air Quality Management District. Rule 403. Last amended June 3, 2005. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4>

⁷ South Coast Air Quality Management District. Compliance and Enforcement Staff's contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.

South Coast Air Quality Management District (SCAQMD)– Comment Letter E**E-1:**

Responses to SCAQMD’s comments are provided below.

E-2:

The City acknowledges the background information on the 2016 Air Quality Management Plan (AQMP) provided by SCAQMD. The DEIR discusses the 2016 AQMP at DEIR page 4.2-11.

E-3:

The commenter’s summary of the project description is accurate, but the City of Colton provides the following responses for clarification. The Project is not proposed by the lead agency (City of Colton) as stated in the SCAQMD’s comment. The City of Colton, as the CEQA Lead Agency, prepared the DEIR in accordance with CEQA Guidelines Article 9, § 15120 to § 15132, to evaluate the potential environmental impacts associated with planning, constructing, and operating the Roquet Ranch Specific Plan Project (the “Project”) that is proposed by a private developer (Sunmeadows, LLC). To supplement the project description provided by the SCAQMD, it should also be noted that in the event that Planning Areas 12 and 13 are not respectively developed with an elementary school or fire station, these Planning Areas would be developed with residential land uses which could result in the Project site being developed with a total of up to 1,050 residential dwelling units.

E-4:

The commenter accurately describes the conclusions of DEIR Subsection 4.2, *Air Quality*, and the Project’s Air Toxic and Criteria Pollutant Health Risk Assessment (EIR *Technical Appendix C*).

E-5:

The Project-specific Air Toxic and Criteria Pollutant Health Risk Assessment (HRA; EIR *Technical Appendix C*) identifies health risks using the 2003 guidelines established by the California Office of Environmental Health Hazard Assessment (OEHHA). The analysis in the HRA and DEIR are conservative in nature and assume constant exposure 24 hours per day over the course of various exposure periods. As such, averaging the emissions by age-bin is not necessary for several reasons as discussed below.

The 2015 OEHHA guidance¹ was reviewed to determine applicability of the use of early life exposure adjustments to identified carcinogens. For risk assessments conducted under the auspices of The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB2588), OEHHA applies specific adjustment factors to all carcinogens regardless of purported mechanism of action. However, the 2015 OEHHA guidance relied upon U.S. EPA guidance relating to the use of early life exposure adjustment factors (Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, EPA/630/R-003F) whereby adjustment factors are only considered when carcinogens act “through the mutagenic mode of action.” A mutagen is a physical or chemical agent that changes

¹ http://oehha.ca.gov/air/hot_spots/hotspots2015.html



genetic material, such as DNA, increasing the frequency of mutations to produce carcinogenic effects. The use of adjustment factors is recommended to account for the susceptibility of producing adverse health effects during early life stages from exposure to these mutagenic compounds. None of the carcinogens considered in the Health Risk Assessment (HRA) for this Project elicit a mutagenic mode of action and, therefore, the use of age-specific adjustment factors is not warranted.

The U.S. EPA has said that the age sensitivity factors (ASFs), should only be applied to pollutants that elicit a primary mutagenic mode of action. In fact, the U.S. EPA has a list of 12 compounds that elicit a primary mutagenic mode of action for which ASFs would be appropriate (https://www.epa.gov/sites/production/files/2015-01/documents/cgiwg-communication_ii.pdf). None of the Project's pollutants elicit a primary mutagenic mode of action.

By way of background, the Air Toxics "Hot Spots" Information and Assessment Act requires stationary sources (facilities) to report the type and quantity of substances they routinely release into the air. The regulation requires that toxic air emissions from facilities be quantified and compiled into an inventory according to criteria and guidelines developed by CARB, that each facility be prioritized to determine whether a risk assessment is conducted, that risk assessments be conducted according to methods developed by OEHHA and that the public be notified of significant risks. Please note that OEHHA clarifies its risk assessment's applicability by stating that roadways are not part of the Hot Spots program because the program only addresses stationary sources².

It should be noted that neither the South Coast Air Quality Management District (SCAQMD) nor any other air agency in the Southern California region has adopted guidance on the applicability/use of ASFs under CEQA. At the June 5, 2015 SCAQMD Board Meeting, the SCAQMD adopted the 2015 OEHHA guidelines for use in their permitting process. Notwithstanding, the SCAQMD acknowledged in their response to comments received on the revised permitting rules³ that:

“The Proposed Amended Rules are separate from the CEQA significance thresholds. The SCAQMD staff is currently evaluating how to implement the Revised OEHHA Guidelines under CEQA. The SCAQMD staff will evaluate a variety of options on how to evaluate health risks under the Revised OEHHA Guidelines under CEQA. The SCAQMD staff will conduct public workshops to gather input before bringing recommendations to the Governing Board. In the interim, staff will continue to use the previous guidelines for CEQA determinations.”

Furthermore, at a June 18, 2015 Association of Environmental Professionals (AEP) meeting, the SCAQMD staff (Ms. Jillian Wong, Ph.D.) stated that any new guidance regarding ASFs under CEQA for projects where SCAQMD is not the lead agency, will not be adopted until a public process is completed. At this time, no such process has commenced and no formal guidance has been adopted.

² <https://www.arb.ca.gov/ab2588/motorv.pdf>

³ See Response to Comment #13, Page A-7 and A-8 of the June 5, 2015 board meeting Agenda No. 28. <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2015/2015-jun1-028>.



Lastly, as previously noted, the SCAQMD is in the process of evaluating how the 2015 OEHHA Guidelines will be applied to CEQA projects under their jurisdiction and currently recommends continued use of previous guidelines for CEQA determinations. In the rulemaking activity for the 2015 OEHHA guidelines as they apply to permitting projects, the SCAQMD also recommends use of the previous version of the OEHHA guidelines for spray booths and retail gasoline stations⁴.

As such, the analysis in the HRA and DEIR is conservative and overstates potential impacts from diesel particulate matter (DPM). Based on the foregoing, no revisions to the DEIR or HRA are necessary in response to this comment.

E-6:

Responses to all of SCAQMD's comments are provided above.

E-7:

The contact information provided by SCAQMD is acknowledged.

E-8:

The DEIR and HRA (EIR *Technical Appendix C*) correctly utilize the average (mean) breathing rates. The DEIR and HRA are very conservative as the analysis assumes constant exposure 24 hours per day 7 days per week for 9- and 30-year exposure durations. CEQA does not require use of the most extreme, maximum possible worst-case scenario, but a reasonable assessment of project impacts. As such, use of the mean breathing rates with the conservative assumptions on exposure duration used in the DEIR and HRA represent a reasonable maximum exposure scenario consistent with CEQA requirements. As such, no revisions to the Project's HRA or DEIR are required. Please see Response to Comment E-5 for additional discussion regarding this topic.

E-9:

The City of Colton acknowledges the potential mitigation measures included on the SCAQMD's referenced website. Please refer to the responses to SCAQMD Comments E-10 and E-11 that address the two specific measures suggested by the SCAQMD for the Roquet Ranch project.

E-10:

In response to this comment, Mitigation Measure MM 4.2-1 has been revised to require that a note be added to the grading plan mandating the use of CARB Tier 4 construction equipment in the event that such equipment is available on a timely basis within a 200-mile radius of the Project site. The revisions to MM 4.2-1 are indicated in Section F.3, Corrections and Additions, of this Final EIR.

⁴ See Page 3 of the June 5, 2015 board meeting Agenda No. 28. <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2015/2015-jun1-028>.



E-11:

In response to this comment, Mitigation Measure MM 4.2-2 has been added to require the use of 2010 model year diesel haul trucks that conform to 2010 EPA truck standards or newer diesel haul trucks. The revisions to MM 4.2-2 are indicated in Section F.3, Corrections and Additions, of this Final EIR.

E-12:

The City notes that the Project would be required to comply with SCAQMD Rule 403 (e) – Additional Requirements for Large Operations. In order to respond to this comment, the City has revised Subsection 4.2.5 of the DEIR to include a discussion of the applicability of SCAQMD Rule 403 and also to demonstrate the Project’s required compliance with the applicable components of SCAQMD Rule 403. The revisions are summarized in Table F-2, *Errata Table of Additions, Corrections, and Revisions*.



LETTER F (Page 1 of 2)

825 East Third Street, San Bernardino, CA 92415-0835 | Phone: 909.387.8109 Fax: 909.387.7876



Department of Public Works

- Flood Control
- Operations
- Solid Waste Management
- Surveyor
- Transportation

www.SBCounty.gov

Kevin Blakeslee, P.E.
Director

September 14, 2017

City of Colton
Development Services Department
659 N. La Cadena Drive
Colton, CA. 92324

File: 10(ENV)-4.01

RE: CEQA – NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE ROQUET RANCH SPECIFIC PLAN FOR THE CITY OF COLTON

To whom it may concern:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on August 7, 2017** and pursuant to our review, the following comments are provided:

General Comments

1. We are aware there may be storm drains in and around the project site that may be affected by the proposed project. When planning for or altering existing or future storm drains, be advised that the Project is subject to the San Bernardino County Flood Control District's (District) Comprehensive Storm Drain Plan No. 3 dated May 1973. Drainage improvements should be reviewed by the City Engineer and by the Jurisdiction responsible for the facilities impacted by the project. If you have any questions, please contact David Lovell in the Flood Control Planning Division at 909-387-8120.

Flood Control Planning Division (David Lovell, PWE III, 909-387-7964):

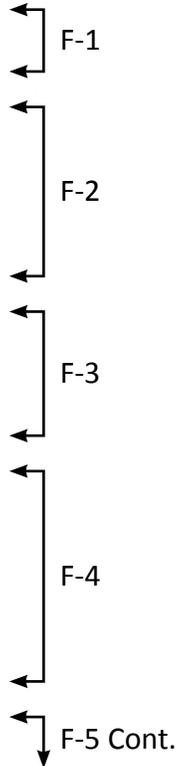
1. Since the northwestern portion of the proposed project is adjacent to the District's Santa Ana River Facility, any work affecting the right-of-way would need a Flood Control Encroachment Permit. If permits are required, their necessity and any impacts associated with the construction should be addressed in the DEIR.

Environmental Management Division (Patrick Egle, Planner III, 909-387-8109):

1. Page 35: The DEIR states "No impacts to USACE or RWQCB jurisdiction within the Santa Ana River or the physical streambed of the river will occur..."

Comment 1: The residential development of 874 homes, as well as retail commercial land use and recreational open space, will certainly contribute runoff from the development of the property into the Santa Ana River, which would impact the District. Are these impacts addressed adequately? Right now those drainages can be seen dry on page 43 of the BRA, however, will they remain dry after development? This should be thoroughly analyzed and discussed in the DEIR.

2. Page 73: The DEIR provides a table with Brittle Brush scrub (G4S3), a known sensitive community impacts of at least 50 acres.



BOARD OF SUPERVISORS

ROBERT A. LOVINGOOD
Chairman, First District

JANICE RUTHERFORD
Second District

JAMES RAMOS
Third District

CURT HAGMAN
Vice Chairman, Fourth District

JOSIE GONZALES
Fifth District

DENA M. SMITH
Interim Chief Executive Officer



LETTER F (Page 2 of 2)

City of Colton
CEQA NOP Roquet Ranch Specific Plan
September 21, 2017
Page 2 of 2

Comment 2: The Manual of California Vegetation - Sawyer, Keeler-Wolf, uses alliances to more accurately reflect the dominate vegetation communities by developing quantitative, defensibly definitions of rare and threatened plant communities. For alliances with state ranks of S1-S3, all associations within them are considered to be highly imperiled. Yet in the Mitigation chapter 7 there is no discussion of impacts to Brittle Brush scrub or discussion of mitigation measure for these impacts. The DEIR should be amended to discuss these potential impacts and appropriated mitigation.

F-5 Cont.

- 3. Page 88: Mitigation for impacts to Jurisdictional waters is discussed. Off-site mitigation is offered.

Comment 3: No mention was made of the impacts of this development to the waters of Santa Ana River. With this development, significant run off and nuisance flows will be added to the drainages into the Santa Ana River. Potential impacts of this increased water runoff into the Santa Ana River was not mentioned nor addressed and therefore no mitigation offered. This should be thoroughly analyzed and discussed in the DEIR.

F-6

- 4. Page 89: Under 7.2.4 Measures to Mitigate Potentially Significant Impacts to Migratory or Nesting Birds, MM Bio-7, under number 1: Vegetation removal activities shall be scheduled outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to avoid potential impacts to nesting birds.

F-7

Comment 4: The adequacy of this mitigation measure is unclear as the nesting season for songbirds is not Sept 1 to Feb 14 but from Feb 14 to September 1. This should be clarified in the Final EIR.

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individuals who provided the specific comment, as listed above.

Sincerely,

Michael R. Perry
Supervising Planner
Environmental Management

F-8

MP:LB:sr

Email: planning@coltonca.gov



County of San Bernardino Department of Public Works – Comment Letter F

F-1:

The City of Colton acknowledges receipt of the County San Bernardino Department of Public Works' (hereafter referred to as "the County") comments on the DEIR. The City's responses to the County's comments are provided below.

F-2:

The Project site is not subject to San Bernardino County Flood Control District's Comprehensive Storm Drain Plan No. 3 because it is not located within any of the District's Area Drainage Plan boundaries, which are topographically and hydrologically separated from the Project site by the Santa Ana River. No stormwater that would outlet from the Project site would reach any facilities associated with Comprehensive Storm Drain Plan No. 3. Moreover, the Project's drainage improvements would be reviewed by the City of Colton City Engineer and all other applicable public agencies prior to the City's issuance of building permits. No revisions to the DEIR are warranted with respect to this comment.

F-3:

Based on the Specific Plan and other application materials that the Project Applicant submitted to the City of Colton for the proposed Project that were used to prepare the environmental analysis in the DEIR, it is not anticipated that the Project would require SBCFCD to issue an encroachment permit because the Project does not propose any work affecting the Santa Ana River Facility right-of-way. Furthermore, Table 3-6, *Matrix of Project Approvals/Permits*, is not intended to be exhaustive of all permits and approvals required for the Project, but rather to provide a list of permits and other approvals that are known to be required to implement the Project in accordance with CEQA Guidelines §15124(d). Based on the foregoing, no revisions to the DEIR are warranted with respect to this comment.

F-4:

The Project would drain treated flows from the development into the Santa Ana River by way of existing culverts, while off-site construction to install utilities over the Santa Ana River would be fastened to the existing South Riverside Avenue bridge. Therefore, no streambed impacts that would warrant authorization under the federal Clean Water Act would be required to construct the Project, as documented in the DEIR and the Biological Resources Assessment (EIR *Technical Appendix D*).

Additionally, the Project has been designed in compliance with all local, state, and federal requirements required to ensure that adverse effects to hydrology and water quality proposed by the Project are less than significant with mitigation. The Project would retain and treat runoff prior to discharge.

Furthermore, as described in the Project-specific Biological Resources Assessment (EIR *Technical Appendix D*), all of the existing on-site drainages exhibit ephemeral flow. Ephemeral streams generally move runoff only during, and immediately after, a storm event. Some ephemeral drainages that would



be affected by the Project may exhibit slightly wetter conditions near outlets associated with a development due to the discharge of nuisance flows, but due to the low volumes associated with nuisance flows, such discharge would be highly localized.

As discussed in EIR Subsection 4.8, *Hydrology and Water Quality*, the Project is required to prepare a Storm Water Pollutant Prevention Plan (SWPPP) in compliance with the National Pollution Discharge Elimination System (NPDES) program overseen by the Santa Ana Regional Water Quality Control Boards (RWQCB). The SWPPP would address construction-related water quality issues and the Project would include water quality basins and water quality/detention basins to address long-term water quality. The proposed water quality and detention basins would regulate the Project's increase to peak storm water runoff compared to existing conditions. Accordingly, with implementation of the proposed drainage plan (consisting of an integrated system of underground storm drain pipes and water quality detention basins) and compliance with the SWPPP, the Project would not violate any water quality standards or waste discharge requirements on a direct or cumulatively considerable basis.

Based on the foregoing, the Project would not contribute substantial runoff to the Santa Ana River that could result in an impact to the Santa Ana River that is not already disclosed in the DEIR. Based on the foregoing, no revisions to the DEIR are warranted with respect to this comment.

F-5:

In the DEIR, the common name "brittle bush" is defined as *Encelia farinosa* and, as described in the Project-specific Biological Resources Assessment (EIR *Technical Appendix D*), it dominates the "Brittle bush scrub" community. The "California brittle bush" that is referenced in the County's comment F-5 was not observed at the Project site during the biological surveys that were performed. As stated on pages 4.3-27 through 4.3-28 of the DEIR, the brittle bush scrub plant community observed at the Project site is not considered a sensitive habitat according to the Project-specific Biological Resources Assessment (*Technical Appendix D*). Therefore, the DEIR properly concluded that the Project would have no impact on sensitive plant species. No revisions to the DEIR are warranted with respect to this comment.

F-6:

Please refer to the City's response to the County's comment F-4 above. With implementation of the Project's proposed storm drain facilities and adherence to the SWPPP, the Project would not contribute substantial storm water runoff, siltation, or erosion to the Santa Ana River. The proposed detention basins and water quality basins have been designed to mitigate the increased storm water runoff and improve water quality prior to discharge of storm water from the Project site. Additionally, a Project-specific water quality management plan (WQMP; EIR *Technical Appendix J*) has been prepared which describes the Project's compliance with the NPDES Areawide Stormwater Program within the Santa Ana Region. The proposed storm water treatment best management practices (BMPs) have been selected and designed to meet the requirements of Regional Water Quality Control Board Order No. 08-2010-0036. Based on the foregoing, no revisions to the DEIR are warranted with respect to this comment.



F-7:

Mitigation Measure MM 4.3-7 has been revised in the Final EIR to clarify that the nesting season for songbirds typically occurs between February 15 and August 31 and the nesting season for raptors occurs between January 15 to August 31. This revision is summarized in Table F-2, *Errata Table of Additions, Corrections, and Revisions*.

F-8:

The City of Colton has confirmed that the County is included on the City's mailing list to receive all future public notices for the Roquet Ranch project concerning but not limited to public reviews and public hearings.



LETTER G (Page 1 of 4)



_____ Planning and Development Services Department

Delivered by Electronic Mail

September 21, 2017

Mario Suarez
City of Colton Planning Division
659 N. La Cadena Drive
Colton, CA 92324

**Re: Draft Environmental Impact Report – Roquet Ranch Specific Plan
SCH 2016061056**

Dear Mr. Suarez:

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) prepared for the Roquet Ranch Specific Plan. The Specific Plan area is adjacent to the City of Grand Terrace and has the potential to create up to 1,050 dwelling units, and to generate a net total of 10,021 trips per day.

G-1

It is anticipated that motorists will utilize Grand Terrace roadways to either enter onto the 215 Interchange at Barton Road or Mount Vernon, or to bypass the Interchange and travel east on Barton Road.

G-2

We have reviewed the Traffic/Transportation Section of the DEIR, which identifies significant impacts to Grand Terrace roadways and intersections, which must be mitigated.

G-3

The DEIR identifies impacts to City intersections located at Michigan Avenue and West Main Street (#36) and Mount Vernon Avenue and Main Street (#38).

Intersection # 38 will worsen from LOS E to LOS F at Opening Year 2020, and Intersection #36 will worsen from LOS E to LOS F at Horizon Year 2040, exacerbating already deficient conditions. The Roquet Ranch Specific Plan Traffic Impact Analysis identifies a fair share contribution in order to mitigate these significant impacts; however, they are not carried over to the DEIR as a mitigation measure. Further, the mitigation recommended in the Roquet Ranch Specific Plan Traffic Impact Analysis may not be adequate, as Grand Terrace includes these intersections in its Circulation Fee Program. This program would require payment of traffic signal impact fees towards signal improvements in the amount of \$283.53 per detached dwelling unit and \$145.57 per attached dwelling unit.

G-4

22795 Barton Road, Grand Terrace, California, 92313-5295 909/824-6621 Fax 909/824-6624



LETTER G (Page 2 of 4)

Comments on Roquet Ranch DEIR
Page 2

The Barton Road Interchange Project is expected to be completed in 2020. The design will extend Commerce Way at its intersection with Michigan Street and extend it east and west to Barton Road, where it will align with Vivienda Avenue to the north. The DEIR should consider this intersection in the 2016, 2020 and 2040 projections and analysis.

G-5

In addition, the attached memorandum identifies areas within the Roquet Ranch Specific Plan Traffic Impact Analysis that require revision; and which may result in alternative recommendations or mitigation measures.

G-6

Should you have any questions or require additional information, feel free to contact Public Works Director Alan French at (909) 824-6621 ext. 251 or me at (909) 824-6621 ext. 225.

Sincerely,

SANDRA MOLINA
Planning and Development Services Director

G-7

c: Alan French, Public Works Director



LETTER G (Page 3 of 4)



City of Grand Terrace
Memorandum
Public Works Department

DATE: September 21, 2017

TO: Sandra Molina, Planning Director
Planning and Development Services Department

FROM: Alan French, P.E., Director
Public Works Department

SUBJECT: **TR 19983 Draft Specific Plan Submittal**
Roquet Ranch

City of Grand Terrace Public Works Department has received the following data:

1. Draft Environmental Impact Report for Roquet Ranch Specific Plan dated August 2, 2017, SCH No. 2016061056
2. Roquet Ranch Specific Plan Traffic Impact Analysis dated November 30, 2016

G-8

Public Works has completed the review of the above reference material and has the following comments on the material reviewed:

Provide corrected study and required documentation for review of the proposed project as follows:

- (1) Revised traffic model
- (1) Update DEIR impact mitigations

G-9

All scoping studies for intersections within the City of Grand Terrace should be reviewed and agreed to by the Grand Terrace.

The traffic model needs to include the configurations that are existing or for the opening year, and should consider future intersections that are in process and will be in operation for first occupancies model year of 2020.

Traffic Study Comments:

1. The mitigation recommended by the traffic study needs to be included in the DEIR. However, as noted in the cover letter, the mitigation recommended in the Roquet Ranch Specific Plan Traffic Impact Analysis may not be adequate, as Grand Terrace includes these intersections in its Circulation Fee Program. This program would require payment of traffic

G-10 Cont.



LETTER G (Page 4 of 4)

Memo to Planning Director
Page 2 of 2

- signal impact fees towards signal improvements in the amount of \$283.53 per detached dwelling unit and \$145.57 per attached dwelling unit. ↑ G-10 Cont.
- 2. Additional traffic analysis will be required as individual projects are submitted to ensure mitigation is being implemented and effective. ← G-11
- 3. Extension of Commerce Way to Taylor not included in model and is under preliminary design at this time. ← G-12
- 4. New signal at Town Square and Barton Road not included and is a CMP intersection. ← G-13
- 5. Will Palm and Barton be affected? Only the WB left on Palm movement may be affected. Preston and Barton may have more impact. Same intersection configuration is at Canal and Barton which also is a CMP intersection, but was not considered. ← G-14
- 6. The Michigan and Barton intersection will be moved to align with Vivienda Avenue and Commerce Way. ← G-15
- 7. Signal on west side of freeway will be eliminated, need round-a-bout modeled. ← G-16
- 8. Recommendation #18 of table 1-5 has been completed in table. ← G-17
- 9. Recommendation #26 of Table 1-5 identifies the round-a-bout, but not used in model. ← G-18
- 10. Traffic signal Warrant not needed at location #24, 25 of Table 2-3. ← G-19
- 11. Instead of Palm and Barton, there are closer intersections that would get more impact to justify a warrant analysis. ← G-20
- 12. Analysis of Michigan and Main addressed school am peak. Signal also at main and school entrance. ← G-21
- Specific Plan Comments: ← G-22
- 1. Traffic Model mitigation recommendations not proposed in the DEIR. ← G-23
- 2. Requirement for fair share provided in analysis but not implemented in DEIR. ← G-24
- Should you have any questions or require additional information, please do not hesitate to contact me at x251. ←



City of Grand Terrace Planning and Development Services Department – Comment Letter G

G-1:

The City of Grand Terrace accurately states that the Project proposes to develop a site adjacent to the City of Grand Terrace jurisdictional boundary with up to 1,050 residential dwelling units and is calculated to generate up to 10,021 vehicle trips per day.

G-2:

As depicted on DEIR Figure 4.14-1, *Project (Residential) Trip Distribution*, and Figure 4.14-2, *Project (Commercial) Trip Distribution*, the Project-specific Traffic Impact Analysis (TIA) (EIR *Technical Appendix L*) concluded that Project-related traffic is anticipated to utilize roadway facilities located within the City of Grand Terrace.

G-3:

The commenter accurately recognizes the findings disclosed in Subsection 4.14, *Transportation and Traffic*, of the DEIR that the Project would contribute to cumulatively significant impacts at intersections located within the jurisdiction of the City of Grand Terrace. No revisions to the DEIR are warranted in response to this comment.

G-4:

This comment accurately recognizes that the Project would result in cumulatively considerable impacts to Intersection #36 – Michigan Avenue and West Main Street under the Horizon Year 2040 scenario and to Intersection #38 – Mount Vernon Avenue and Main Street under the Opening Year 2020 scenario. The comment also accurately recognizes the DEIR did not identify mitigation to reduce the Project’s impacts to these intersections to a level below significance as the improvements subject to such a mitigation measure would occur outside of the jurisdictional boundaries of the City of Colton and because the City of Grand Terrace has not established a fair-share contribution program that would accommodate the payment of fees by applicants of projects located outside the City of Grand Terrace that would be specifically used for improvements at these specific intersections.

Nevertheless, Mitigation Measure MM 4.14-5 has been added to the Final EIR in Subsection 4.14, *Transportation and Traffic*, as a good faith effort to address the Project’s cumulatively considerable impacts at Intersection #36 and Intersection #38. Because the City of Grand Terrace, and not the City of Colton, has jurisdiction over these intersections, the City of Colton cannot guarantee that the needed improvements will be constructed, even if a mitigation fee program were to be established. Thus, implementation of this Mitigation Measure cannot be guaranteed and the conclusion of the Draft EIR stands that the Project’s impacts to Intersection #36 – Michigan Avenue and West Main Street and Intersection #38 – Mount Vernon Avenue and Main Street would be significant and unavoidable.

G-5:

Additional analysis of the potential for traffic impacts was conducted for the intersection of Vivienda Avenue at Barton Road in a supplemental memo dated October 24, 2017 prepared by the traffic



engineer that prepared the TIA (Appendix L of the DEIR). The supplemental memo has been provided as Attachment B to this Final EIR. In the existing condition, the intersection of Vivienda Avenue and Barton Road is controlled by a four-way stop sign and experiences acceptable levels of service in both the AM and PM peak hours. As noted by the commenter, the improvement of the intersection is a component of the Barton Road Interchange Project, which is expected to be completed in 2020 and would result in the installation of traffic signals at the intersection. The analysis conducted in the supplemental memo indicates that the proposed Project would result in less than significant impacts in the Existing + Project, Opening Year (2020) With Project and Horizon Year (2040) With Project scenarios. As such, the additional analysis provided in the supplemental memo is provided for informational purposes to confirm the conclusions identified in the DEIR. Further, because this analysis does not identify any new significant impacts, the inclusion of the additional analysis does not constitute significant new information.

G-6:

The City acknowledges the memorandum from the City of Grand Terrace Public Works Department. Refer to responses to comments G-8 through G-24 below.

G-7:

The City will contact the City of Grand Terrace Public Works Department or the City of Grand Terrace Planning and Development Services Department with any questions or additional information needs, if necessary.

G-8:

The City acknowledges that the City of Grand Terrace Public Works Department has received and reviewed the DEIR and associated TIA (EIR *Technical Appendix L*). Responses the City of Grand Terrace Public Works Department's comments are provided below.

G-9:

A Project Traffic Study Scoping agreement for the Roquet Ranch project was developed through consultation with City of Colton staff and is provided in Appendix 1.1 of the TIA (EIR *Technical Appendix L*). The preparer of the TIA did not consult with the City of Grand Terrace during preparation of the scoping agreement because the Project is not located within the City of Grand Terrace and the City of Grand Terrace is not the CEQA lead agency for the Project. Traffic report preparer did, however, consult with City of Grand Terrace to obtain a list of cumulative projects within the City of Grand Terrace for consideration in the TIA analyses (refer to DEIR Table 4.0-1, *Cumulative Projects List*). Suggestions provided in this comment letter regarding traffic model and mitigation measure revisions are responded to in the responses to comments G-10 to G-24.

G-10:

Please refer to the response provided under comment G-4 above. Revisions to the DEIR in response to comment G-4 and this comment G-10 are summarized in Table F-2, *Errata Table of Additions, Corrections, and Revisions*.



G-11:

The DEIR provides a project-level analysis and the Project-specific TIA (EIR *Technical Appendix L*) fully evaluates all traffic-related impacts that could result from the Project as it is proposed. Therefore, with respect to the proposed Project that is evaluated in the DEIR (Roquet Ranch Specific Plan), no additional traffic analysis is required beyond the Project-specific TIA (EIR *Technical Appendix L*). No revisions to the DEIR are warranted in response to this comment.

G-12:

The comment correctly states that the future planned extension of Commerce Way to Taylor was not evaluated in the Project's TIA. The Project trip distribution patterns were derived based on the current version of San Bernardino County Transportation Analysis Model (SBTAM). The Project trip distribution patterns were also reviewed and approved by City of Colton staff as part of the traffic study scoping process. Traffic assigned to adjoining roadway system based on the Project's trip generation, trip distribution and planned local street improvements indicated that Project would contribute less than 50 peak hour trips to future extension of Commerce Way. Any contributions of less than 50 peak hour trips is considered a less-than-significant impact. No revisions to the DEIR are warranted in response to this comment.

G-13:

The study area that was evaluated in the TIA was identified based on a review of the Project area by City of Colton staff. The City requires that traffic studies evaluate all intersections of two roadways at locations where a project would contribute 50 or more peak hour trips. The City's traffic study requirements do not mandate the evaluation of signalized driveways. Accordingly, the TIA properly excluded the traffic signal at Town Square and Barton Road because the signal provides traffic control to an access driveway into a private shopping center and is not located at an intersection of two roadways. Additionally, although Barton Road is a CMP facility, the traffic signal is not located at a CMP-monitored intersection. Therefore, no additional analysis is required in the DEIR and no revisions to the DEIR are warranted in response to this comment.

G-14:

The Project's impacts to the intersection of Palm Avenue and Barton Road (Intersection #39) were evaluated in the TIA. The Project would not result in or worsen a deficiency at Intersection #39 under any of the evaluated traffic scenarios (DEIR at subsections 4.14-7 and 4.14-8). The Project trip distribution patterns were derived based on the current version of SBTAM. The Project trip distribution patterns were also reviewed and approved by City of Colton staff as part of the traffic study scoping process. Traffic assigned to adjoining roadway system based on the Project's trip generation, trip distribution and planned local street improvements indicated that Project would contribute less than 50 peak hour trips to future extension of Commerce Way. Similarly, Project would contribute fewer than 50 peak hour trips to the intersection of Preston Street and Barton Road. The Project would not contribute more than 50 peak hour trips to the intersection of Preston Street and Barton Road; therefore, in accordance with the intersection analysis criteria described in subsection 1.3.1 of the TIA,



the Project's impacts to this intersection were not required to be evaluated. Any contributions of less than 50 peak hour trips is considered a less-than-significant impact. No revisions to the DEIR are warranted with respect to this comment.

G-15:

The City acknowledges that the planned improvements associated with the Barton Road Interchange Project that will be implemented by the City of Grand Terrace will result in the realignment of the Michigan Avenue and Barton intersection to Vivienda Avenue and Barton Road. Please see response to comment G-5, which provides additional analysis related to the realigned intersection at Barton Road. No revisions to the DEIR are warranted in response to this comment.

G-16:

The information provided in DEIR Table 4.14-7, *Intersection Analysis for Opening Year Cumulative (2020) Conditions*, and DEIR Table 4.14-9, *Intersection Analysis for Horizon Year (2040) Conditions*, includes the roundabout improvement that was modeled at La Crosse Avenue / I-215 southbound on-ramp / Barton Road (Intersection #26) in the TIA under the 2020 and 2040 traffic conditions scenarios. Thus, no revisions to the DEIR are warranted with respect to this comment.

G-17:

The City acknowledges that the intersection improvements associated with "recommendation #18" have been implemented. However, at the time that the Project's TIA was prepared (November 2016), this improvement was not yet operational. The implementation of the intersection improvements at this intersection would reduce the Project's traffic impacts to intersection #18 as these improvements would achieve the reduction in the delay at this intersection that would occur with the implementation of Mitigation Measure 4.14-3. Accordingly, no revisions to the DEIR are warranted with respect to this comment.

G-18:

The traffic modeling in the TIA evaluated a roundabout at Intersection #26 under the 2020 and 2040 traffic scenarios. The roundabout was not evaluated for Existing Plus Project or Existing traffic conditions scenarios because the roundabout did not exist at Intersection #26 under the Existing (2016) traffic scenario. However, the supplemental traffic memorandum included as Attachment A to this FEIR includes supplemental analysis of the La Cross Avenue/I-215 southbound ramp at Barton Road in the existing plus project (E+P) condition with the implementation of the roundabout. This analysis confirms that this intersection would operate at acceptable LOS in the E+P condition with the implementation of the roundabout. Accordingly, the DEIR TIA's evaluation of impacts in the Existing Plus Project and Existing conditions properly relied on conditions as they existed at the time the TIA was prepared (and at the time that the EIR's Notice of Preparation (NOP) was posted) and that the implementation of the roundabout would not affect the conclusions in the DEIR related to this facility.



G-19:

The City of Colton acknowledges the comment regarding traffic signal warrants. The information regarding traffic signal warrants is provided in the DEIR for informational purposes at DEIR page 4.14-19.

G-20:

The commenter indicates that “there are closer intersections that would get more impact to justify a warrant analysis.” However, the commenter does not indicate which specific intersections would justify a warrant analysis. The study area for the warrant analysis conducted in the TIA evaluated all unsignalized intersections in the Project area until the analysis determined that the Project’s peak hour volume contributions no longer resulted in a traffic signal warrant. Accordingly, the information provided in the TIA and summarized in Subsection 4.14.7 of the DEIR thoroughly disclosed the unsignalized intersections calculated to meet peak hour volume-based traffic signal warrants and no revisions to the DEIR are necessary. Moreover, as noted in response to comment G-19, the traffic signal warrant analysis is provided in the DEIR for informational purpose and is not used as a basis for the determination of environmental impacts in the DEIR.

G-21:

The intersection of Michigan Avenue and Main Street was included in the TIA study area (as indicated in Table 4.14-1 of the DEIR as intersection #36). The DEIR provides A.M and P.M. peak hour analysis of intersection #36, as shown on DEIR Table 4.14-5, 4.14-7, and 4.14-9. The study area that was evaluated in the TIA was identified based on a review of the Project area by City of Colton staff. The City requires that traffic studies evaluate all intersections of two roadways at locations where a project would contribute 50 or more peak hour trips. The City’s traffic study requirements do not mandate the evaluation of signalized driveways. Accordingly, the TIA properly excluded the traffic signal located along Main Street at the entrance to Grand Terrace High School because the signal provides traffic control to an access driveway into the high school and is not located at an intersection of two roadways. Therefore, no additional analysis is required in the DEIR and no revisions to the DEIR are warranted in response to this comment.

G-22:

Refer to the response to comment G-4. The DEIR identified all available feasible mitigation measures that are within the City of Colton’s jurisdiction to ensure and enforce and that would substantially lessen or avoid significant impacts the project would have on the environment.

G-23:

Please refer to the response provided under comments G-4 and G-10 above. Revisions to the DEIR in response to comment G-4, G-10, and G-23 are summarized in Table F-2, *Errata Table of Additions, Corrections, and Revisions*.

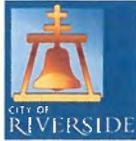


G-24:

The contact information for the Director of the City of Grand Terrace Public Works Department is noted.



LETTER H (Page 1 of 4)



Community Development
Department
Planning Division

City of Arts & Innovation

September 21, 2017

Mario Suarez
City Colton Planning Division
659 N. la Cadena Drive
Colton, CA

Subject: Notice of Availability of a Draft Environmental
Impact Report for the Roquet Ranch Specific Plan

Dear Mr. Suarez:

Thank you for the opportunity to comment on the Roquet Ranch Specific Plan. We note that the proposed 336.2-acre Specific Plan will accommodate 450 Low Density single-family detached residential units on 60.2 acres, 293 Medium Density residential units on 19.2 acres, 131 High-Density residential townhome units on 6.0 acres, 1.2 acres of Neighborhood Commercial use, a 10.3-acre school site, a 0.8-acre fire station site, 19.3 acres of recreational open space, 199.7 acres of open space as resource preservation, and 16.5 acres of roadways. We also understand the location of the project to be west of the intersection of Maryknoll Drive and la Cadena Drive within the City of Colton (Colton), and immediately north of, and contiguous with, the City of Riverside (Riverside).

H-1

The City of Riverside has reviewed the Draft Environmental Impact Report (DEIR) for the Roquet Ranch Specific Plan, and provides the following comments for the City of Colton's consideration:

H-2

General Comments:

As you are aware, Riverside is in midst of an effort that will create the Northside Neighborhood Inter-jurisdictional Specific Plan (Northside SP). The Northside SP not only includes the Northside Neighborhood within the City of Riverside, but also includes a 227-acre property in the City of Colton known as Pellissier Ranch. The Pellissier Ranch property is owned by Riverside Public Utilities (RPU), and is contiguous to the western boundaries of the Roquet Ranch Specific Plan. Due to the proposed project's adjacency to the City of Riverside and Pellissier Ranch, the City of Riverside has a vested interest in the use and development of Roquet Ranch.

H-3

As it relates to the Northside SP effort, the City of Riverside currently enjoys an ongoing collaboration with the City of Colton. In this regard, the Riverside Planning Division's primary concern is to ensure that the two adjacent and concurrent specific plan efforts are largely compatible and do not significantly impact each other; while also considering community concerns and impacts on Riverside residents.

H-4

3900 Main Street, Riverside, CA 92522 | Phone: (951) 826-5371 | RiversideCA.gov



LETTER H (Page 2 of 4)

Access:

The Draft Specific Plan identifies access to the Roquet Ranch project area via extensions of Orange Street and Pellissier Road. The Orange Street extension, and a portion of the Pellissier Road extension, encroach onto Riverside Public Utility (RPU) property (Pellissier Ranch). These extensions are shown on Page 3-25 of the DEIR. Not only are these proposed portions of roadways completely outside the boundaries of the Roquet Ranch Specific Plan site, but they would impact RPU with significant off-site grading and construction, including the installation of utilities, landscaping, irrigation, etc. To date RPU has not been approached by the project applicant for this offsite improvement, nor has RPU authorized this proposal. Additionally, the proposal effectively removes developable area from the Pellissier Ranch site, and undermines the ongoing Northside SP process which has yet to identify the preferred land use and circulation alternative for the Pellissier Ranch property.

H-5

While the DEIR describes the off-site work listed above, includes mitigation measures for the encroachment, and duly notes that City of Riverside approval would be required for the proposed alignment, the Specific Plan and DEIR do not explained or justified why the encroaching streets need to be on RPU owned property. As such, the City of Riverside recommends that the alignment of Orange Street be shifted easterly, such that the centerline of the Orange Street roadway is, to the greatest extent possible, straddling the shared property line between the Roquet Ranch project and the RPU owned Pellissier Ranch property.

H-6

Grading:

The proposed Specific Plan includes areas where off-site grading will encroach into the Pellissier Ranch property, mostly northerly of the new street intersection described above. However, these areas of encroachment are not nearly as significant as the grading necessary for the portion of Orange Street that occurs on RPU property.

H-7

Again, while the EIR describes the off-site work listed above, includes mitigation measures for the encroachment, the Specific Plan and DEIR do not explained or justified the need for the encroachment. The City recommends that all off-site grading within the Pellissier Ranch property be eliminated to the greatest degree possible. Should any off-site grading onto Pellissier Ranch be required in the future, the developer(s) will be required to obtain approval from RPU or a subsequent owner. Obtaining approval shall include submitting plans to RPU and completing all work (grading, retaining walls, slope landscaping, irrigation etc.) per any approved plans, to the satisfaction of RPU.

H-8

Traffic:

The City of Riverside's Public Works, Traffic Engineering Division has reviewed the DEIR and has identified the following areas of concern:

Impacts at Main Street & Strong Street:

The traffic generated from the project traffic would result in level of service deficiencies and direct impacts at the intersection of Main Street and Strong Street. While the DEIR recommends lane configuration changes to alleviate the location's deficient levels of service; the DEIR identifies direct impacts to this intersection as significant and unavoidable because they are not within the City of Colton. The City of Riverside requests that the project applicant and their engineer coordinate with the Riverside Public Works Department to discuss the constructability of recommended improvements at this

H-9 Cont.



LETTER H (Page 3 of 4)

intersection, determine a feasible mitigation measure, and ultimately construct the improvements to mitigate the project's direct impact.

Impacts at Orange Street & Center Street:

The traffic generated from the project would also contribute to cumulatively significant impacts at the intersection of Orange Street at Center Street. Notwithstanding the comments above, or the recommendation to re-align the proposed Orange Street extension, the following comments should be considered:

Orange Street is shown as one of two access points for the project. The project is anticipated to route approximately 2,300 daily vehicle trips through the intersection of Orange Street and Center Street, and over 800 of these trips are anticipated to travel along Orange Street. The addition of project traffic to the roadway network warrants the construction of a traffic signal at the intersection of Orange Street and Center Street.

It's understood that, although the City believes a signal may be "warranted," satisfaction of "warrants" does not technically require construction of a signal. However, because the project has identified construction of a traffic signal as a mitigation measure to alleviate deficient levels of service (despite the fact that the DEIR deems this mitigation infeasible), the construction of a traffic signal at this location would be required.

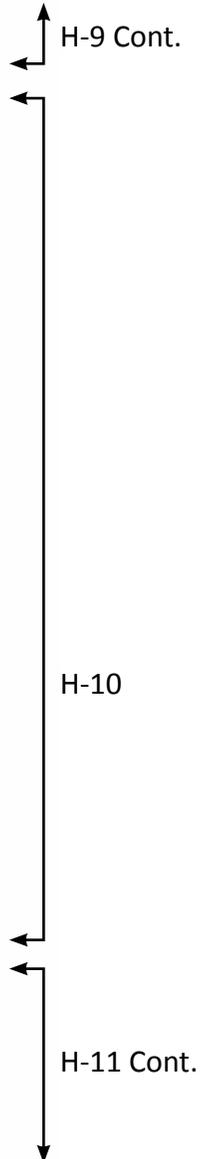
Given the high daily contribution of project traffic to the intersection of Orange and Center Streets, the traffic signal constructed at this location needs to incorporate movement restrictions and physical design elements that restrict north & southbound traffic along Orange Street. This is because:

1. The DEIR estimates a project contribution of approximately 800 daily vehicle trips to Orange Street, south of Center Street.
2. Orange Street serves Fremont Elementary School, and is fronted by residential development.
3. Orange Street is an access point for State Route 60, it is prone to experience cut-through traffic from surrounding uses, including the proposed project.

These movement restrictions and physical design element improvements will require coordination and approval from the City of Riverside Public Works Department.

Finally, we respectfully request that you continue to coordinate with City of Riverside staff regarding this project. Please forward any revised plans, staff reports, and environmental review documents pertaining to this project. Should you have any questions regarding this letter, please contact David Murray, Senior Planner, at (951) 826-5773, or by e-mail at dmurray@riversideca.gov.

Thank you again for the opportunity to provide comments on this proposal. The City of Riverside looks forward to continued collaboration in the future.





LETTER H (Page 4 of 4)

Page 4 of 4

Sincerely,

Jay Eastman, AICP
Principal Planner

JE:dm

cc: Rusty Bailey, Mayor
Riverside City Council Members
John A. Russo, City Manager
Al Zelinka, Assistant City Manager
Rafael Guzman, Community & Economic Development Director
Kris Martinez, Public Works Director
Girish Balachandran, Public Utilities General Manager
Kristi Smith, Chief Assistant City Attorney

H-11 Cont.



City of Riverside – Comment Letter H

H-1:

The Project description provided by the City of Riverside in comment H-1 is accurate. No revisions to the DEIR are warranted in regards to this comment.

H-2:

Responses to the City of Riverside’s specific comments are provided below.

H-3:

The City of Colton acknowledges the information provided by the City of Riverside concerning the ongoing development of the Northside Neighborhood Inter-Jurisdictional Specific Plan (Northside SP). The Northside SP was not included in the list of cumulative projects in the DEIR analysis because no applications regarding the Northside SP project have been received by the City of Colton. Although the City of Riverside is undergoing a public workshop process to discuss the community’s desires concerning the potential land uses that may be planned within the Northside SP boundary, the development of the Northside SP has not reached a point where the specific proposed land uses have been identified or stabilized for future evaluation, as confirmed by commenter in Comment H-5. Indeed, the Northside SP planning process has not yet proceeded to the CEQA environmental review stage and the City of Riverside has not issued a Notice of Preparation of an environmental impact report for the Northside SP project. Accordingly, because the proposed land use plan associated with the Northside SP has not been determined, a cumulative impact evaluation of the development of the Northside SP would not be reasonable or practical as it would be highly speculative. No revisions to the DEIR are warranted in regards to this comment.

H-4:

The City acknowledges the City of Riverside’s concerns regarding compatibility of the proposed Project (Roquet Ranch Specific Plan) and the on-going Northside SP. The DEIR included a cumulative impact analysis that addressed the potential for the Project to cumulatively contribute to significant environmental impacts. However, as discussed in response to comments H-3, the Northside SP was not included in the list of cumulative projects in the DEIR analysis because no preferred land use plan has been proposed by the City of Riverside for the RPU property within the City of Colton or on adjacent land within the City of Riverside. Although the City of Riverside is undergoing a public workshop process to discuss the community’s desires concerning the potential land uses that may be planned within the Northside SP boundary, the development of the SP has not reached a point where the specific land uses have been identified or stabilized for future evaluation. Accordingly, because the land use plan associated with the Northside SP has not been identified or proceeded to the CEQA environmental review process, a cumulative impact evaluation of the development of the Northside SP would not be reasonable or practical as it would be highly speculative. No revisions to the DEIR are warranted in regards to this comment.



H-5:

The commenter accurately describes the Project Applicant's proposed off-site roadway and utility extensions that are proposed on the property that abuts the Project site to the west. The DEIR disclosed the construction and operational characteristics of the proposed improvements, including the off-site infrastructure improvements that would occur within the Riverside Public Utility's (RPU) jurisdiction. Pursuant to CEQA Guidelines § 15002(a), the purpose of the DEIR is to inform governmental decision makers and the public about the physical environmental effects of the proposed project. At the time that the Notice of Preparation (NOP) was posted for the proposed Project in June 2016, no applications for the Northside Specific Plan project had been received by the City of Riverside. At the time of the preparation of this Final EIR, the Northside Specific Plan project is still in a conceptual phase, as indicated by the commenter in noting that the City of Riverside has "yet to identify the preferred land use and circulation alternative" for the adjacent property on which the Northside Specific Plan may be implemented. Although the City of Riverside is undergoing a public workshop process to discuss the community's desires concerning the potential land uses that may be planned within the Northside SP boundary, the development of the SP has not reached a point where the specific land uses have been identified or stabilized for future evaluation. Accordingly, because the land use plan associated with the Northside SP has not been identified or proceeded to the CEQA environmental review process, any evaluation of the development of the Northside SP would not be reasonable or practical as it would be highly speculative. This comment does not identify any potentially significant physical environmental impacts that would occur under the proposed Project that were not properly evaluated in the DEIR. However, the comment will be forwarded to the City's decision-makers for their consideration in evaluating the proposed Specific Plan and Project.

H-6:

The City of Colton acknowledges the City of Riverside's concerns regarding the encroachment of the proposed Orange Street alignment onto the RPU-owned Pellissier Ranch property. The alignment of the extension of Orange Street was selected by the Project Applicant's engineer to minimize grading on both the City of Riverside property and the Project site. The proposed Orange Street alignment also provides the City of Riverside property full access along this extension of Orange Street and to Pellissier Road. The City of Colton acknowledges the City of Riverside's request to shift the Orange Street alignment in an easterly direction. The City of Colton acknowledges that City of Riverside approval will be required for the proposed Orange St. alignment, and any associated off-site grading in this area. A note will be added to the Specific Plan to reinforce this requirement. The purpose of the DEIR is to evaluate the physical environmental effects of a project, as proposed. The DEIR has fully evaluated the impacts associated with the off-site improvements proposed by the Project Applicant, including those that would occur within RPU-owned property. Based on the foregoing, although the Specific Plan may be modified to shift the Orange St. alignment onto the project site if requested by the City of Riverside, no revisions to the DEIR are warranted with regards to this comment.

H-7:

Please see response to comments H-5 and H-6 above; the DEIR discloses the potential for physical environmental impacts associated with the off-site improvements proposed by the Project Applicant.



However, the comment will be forwarded to the City's decision-makers for their consideration in evaluating the proposed Specific Plan and

H-8:

Refer to the responses to comments H-6 and H-7. The proposed slope grading north of Pellissier Road that would encroach into the City of Riverside-owned property would allow for contour grading, which would result in more aesthetically pleasing slopes when viewed from the west. The City of Colton recognizes that any improvements on City of Riverside owned property would require the review and approval of the City of Riverside. The City will require that text will be included in the Specific Plan which acknowledges that approval from RPU will be required for any grading on their property in Pellissier Ranch. If approval is not received from RPU, all grading, as well as the Orange Street alignment, will be contained solely within the project site. No revisions to the DEIR are warranted with respect to this comment.

H-9:

This comment accurately states that the Project would result in significant and unavoidable impacts to Intersection #3 – Main Street and Strong Street under the Existing Plus Project scenario, the Opening Year Cumulative (2020) scenario, and the Horizon Year 2040 scenario. The comment also accurately states the DEIR did not identify mitigation to reduce the Project's impacts to Intersection #3 to a level below significance as the improvements subject to such a mitigation measure would occur outside of the jurisdictional boundaries of the City of Colton and because the City of Riverside has not established a fair-share contribution program that would accommodate the payment of fees by applicants of projects located outside the City of Riverside that would directly contribute to improvements at the specific intersection. Nevertheless, Mitigation Measure MM 4.14-4 has been added to the Final EIR in Subsection 4.14, *Transportation and Traffic*, in a good faith effort to address the Project's significant and unavoidable impacts at Intersection #3, acknowledging, however, that the implementation of this Mitigation Measure is outside of the Project Applicant's control and outside of the Lead Agency's (i.e. City of Colton's) control. Because the City of Riverside, and not the City of Colton, has jurisdiction over Intersection #3, the City of Colton cannot guarantee that the needed improvements would be constructed, even if a mitigation fee program were to be established. Thus, implementation of this Mitigation Measure cannot be guaranteed and the conclusion of the DEIR remains that the Project's impacts to Intersection #3 would be significant and unavoidable.

H-10:

This comment accurately states that the Project would result in significant and unavoidable cumulatively considerable impacts to Intersection #5 – Orange Street and West Center Street under the Opening Year Cumulative (2020) conditions scenario and the Horizon Year 2040 scenario. The comment also accurately states the DEIR did not identify mitigation to reduce the Project's impacts to Intersection #5 to a level below significance as the improvements subject to such a mitigation measure would occur outside of the jurisdictional boundaries of the City of Colton and because the City of Riverside has not established a fair-share contribution program that would accommodate the payment of fees by applicants of projects located outside the City of Riverside that would directly contribute to



improvements at the specific intersection. Nevertheless, Mitigation Measure MM 4.14-4 has been added to the Final EIR in Subsection 4.14, *Transportation and Traffic*, in a good faith effort to address the Project's significant and unavoidable impacts at Intersection #5, acknowledging, however, that the implementation of this Mitigation Measure is outside of the Project Applicant's control and outside of the Lead Agency's (i.e. City of Colton's) control. The implementation of Mitigation Measure MM 4.14-4 would result in the provision of funding for the installation of a traffic signal at Intersection #5. Because the City of Riverside, and not the City of Colton, has jurisdiction over Intersection #5, the City of Colton cannot guarantee that the needed improvements will be constructed, even if a mitigation fee program were to be established. Thus, implementation of this Mitigation Measure cannot be guaranteed and the conclusion of the DEIR stands that the Project's impacts to Intersection #5 would be significant and unavoidable. The City acknowledges the City of Riverside's recommended incorporation of movement restrictions and physical design elements into the traffic signal design at Intersection #5. No further revisions to the DEIR are necessary to respond to this comment.

H-11:

The City of Colton acknowledges and concurs with the City of Riverside's request for continued coordination regarding this Project.



LETTER I (Page 1 of 1)



Tustin, CA | San Diego, CA | Murrysville, PA

JN 988-001

PLANNING 17542 East 17th Street, Suite 100 Tustin, CA 92780 p714.505.6360 f714.505.6361

MEMORANDUM

To: Mario Suarez, Planning Manager, City of Colton

From: Anonymous Caller

Re: **DEIR COMMENTS ISSUED BY ANONYMOUS
PERSON VIA PHONE MESSAGE LEFT WITH CITY
OF COLTON PLANNING DIVISION**

Date: August 16, 2017

On August 16, 2017, Mario Suarez, Planning Manager at City of Colton, received a phone message from an anonymous caller. The caller issued the following comments pertaining to the Roquet Ranch Specific Plan Draft Environmental Impact Report (DEIR):

I-1

- The Project would increase traffic within the City of Colton; and
- The Project would increase population within the City of Colton.

I-2
I-3



www.tbplanning.com

PLANNING | DESIGN | ENVIRONMENTAL | GRAPHICS



Anonymous Caller – Comment Letter I

I-1:

The City acknowledges that an anonymous caller conveyed a phone message to City of Colton staff on August 16, 2017 verbally expressing the commenter's concerns regarding the proposed Project. The memorandum included in this Final EIR, dated August 16, 2017, provides written documentation summarizing the comments that were provided during the phone message.

I-2:

The commenter is accurate in stating that the Project would increase traffic within the City of Colton. The Project's traffic-related impacts on intersections located within the City of Colton are thoroughly analyzed and disclosed in DEIR Subsection 4.14, *Transportation and Traffic*. The commenter did not identify any specific deficiencies in the analysis disclosed in the DEIR.

I-3:

The Project's impacts related to population are evaluated in Subsection 4.11, Population and Housing, of the DEIR. As discussed under Threshold a of Subsection 4.11.3 of the DEIR, the Project would be anticipated to generate 3,633 new residents in the City of Colton through the construction of 1,050 dwelling units. All potential impacts to the environment associated with the population growth have been evaluated in the other subsections of the DEIR. There are no physical environmental effects specific to population growth on the Project site that would result in a significant adverse effect to the environment. Thus, the DEIR properly concluded that impacts associated with population growth are regarded as less than significant. Therefore, the DEIR adequately analyzed the Project's impacts that are related to population growth, and no further analysis is required.



LETTER J (Page 1 of 10)



Page 1 of 10

September 10, 2017

VIA EMAIL

Mario Suarez
City of Colton
659 N. La Cadena Drive
Colton, CA 92324
msuarez@coltonca.gov

SUBJECT: COMMENTS ON ROQUET RANCH SPECIFIC PLAN EIR

To whom it may concern:

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed Roquet Ranch Specific Plan. Please accept and consider these comments on behalf of Golden State Environmental and Social Justice Alliance, a California Social Purpose Corporation, Entity #C4017878. Also, Golden State Environmental and Social Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental and Social Justice Alliance 160 W. Foothill Parkway Ste. 105-92 Corona, CA 92882.

J-1
J-2

As we understand it, the proposed Roquet Ranch Specific Plan proposes to develop the 336.2-acre site with up to 874 residential dwelling units, including a maximum of 450 Low Density (2.1-8.0 dwelling units per acre [du/ac]) detached homes, 293 Medium Density (8.1-16 du/ac) conventional detached single-family homes, and 131 High Density (16.1-22 du/ac) attached townhomes. These unit maximums include 754 single-family residential units, 244 condo/townhomes, and 52 active adult attached units.

J-3 Cont.

160 W. Foothill Parkway Ste. 105-92 Corona, CA 92882



LETTER J (Page 2 of 10)

Page 2 of 10

The Project also proposes the following non-residential uses: 1.2 acres of retail land uses (Neighborhood Commercial) use on the southeastern portion of the site, which includes 6,500 square feet of commercial retail use, a 1,500-square foot coffee shop with drive-thru window, and a 4,000-square foot fast-food restaurant with drive-thru window; 19.3 acres of recreational open space (located primarily on the northwest portion of the site), 199.7 acres of preserved natural habitat (Open Space- Resources), a 0.8-acre fire station site, and a 10.3-acre school site.

In the case that the Colton Joint Unified School District selects not to develop a school facility within Planning Area 12, the Planning Area can be developed with up to 165 Medium Density residential dwelling units. Additionally, in the case that the City of Colton Fire Department selects not to develop a fire station within Planning Area 13, the Planning Area can be developed with 11 Medium Density residential units. If Planning Areas 12 and 13 are not developed for use as an elementary school and fire station, respectively, the total maximum number of dwelling units within the Roquet Ranch Specific Plan Area would be increased to 1,050. Additionally, the Project proposes the construction of a hierarchal roadway circulation system and utility infrastructure systems to serve the Roquet Ranch community.

3.0 Project Description

The EIR proposes two separate project alternatives. Alternative One includes the development of a 10.3-acre School facility within Planning Area 12 and a 0.8-acre Fire Station within Planning Area 13. Alternative Two provides development in the case that neither the School or Fire Station are built at their sites, with 165 Medium Density residential dwelling units developed at the School site and 11 Medium Density residential units at the Fire Station site. The EIR does not clearly state if Alternative One, Two, or both alternatives are presented for analysis in the EIR. The project description must be revised to clearly state which aspects of the proposed Specific Plan are presented for analysis.

The Project Description is deficient in identifying all aspects of the proposed project, including the removal of the existing on-site Roquet Paving Inc. facility which is not disclosed until the Air Quality Analysis Section of the EIR.

J-3 Cont.

J-4

J-5



LETTER J (Page 3 of 10)

4.0 Environmental Analysis

4.0.2 Scope of Cumulative Effects Analysis

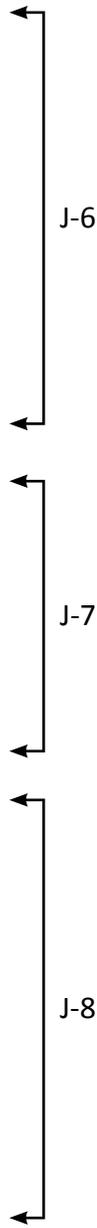
Table 4.0-1: Cumulative Projects List presents a list of 82 projects within the Study Area. The Study Area is defined as the City of Colton, City of Grand Terrace, City of Rialto, City of Riverside, and County of Riverside. The EIR indicates that “areas outside of this study area either exhibit topographic, climatological, or other environmental circumstances that differ from those of the Project area, or are simply too far from the proposed Project site to produce environmental effects that could be cumulatively considerable” without providing specific support for the exclusion of the adjacent city of Jurupa Valley, nearby Fontana, nearby Moreno Valley, or any projects in the nearby community of Bloomington.

Further, the table only gives the project/entitlement number to identify to each project, which is completely irrelevant to the general public and decision makers as they do not have access to the project numbers to identify the projects. A brief land use description and size (square footage) of the projects are given. The table does not indicate if the project is in the planning stage, approved, under construction, or completed. The specific address/location of a majority of these projects is not given at all. This does not comply with CEQA’s requirements for meaningful disclosure. The location, name, and distance from the proposed project site must be disclosed in the EIR in order for public verification of the adequacy of the cumulative impact analysis.

4.2 Air Quality

4.2.3 Methodology for Estimating Project-Related Air Quality Impacts

The EIR notes that the Air Quality Analysis (AQA) is conservative because the emissions calculations do not credit current emissions from operation of the existing paving facility at the project site, which “the project proposes to remove from the site”. The AQA, construction schedule, and CalEEMod output sheets do not indicate any demolition or site preparation as part of the project for analysis. The AQA, construction schedule, and CalEEMod output sheets must be revised to include the demolition/site preparation that includes removing the existing Roquet Ranch Paving Facility as part of the proposed project in order to accurately analyze the project’s potential impacts to air quality.





LETTER J (Page 4 of 10)

A. Methodology for Calculating Project Construction Emissions

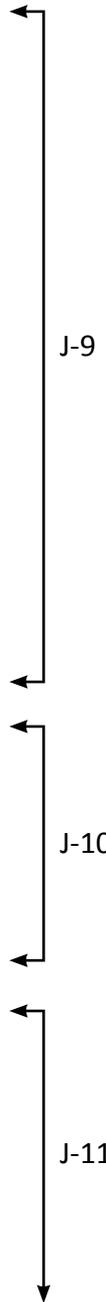
The EIR refers the reader to EIR Subsection 3.4.1, Construction Details for information on construction scheduling, including overlapping phases. *Table 3-5 Construction Duration* communicates that almost all phases of construction were analyzed to overlap by only giving the month and year of construction. The CalEEMod sheets in Appendix B give more detailed information which indicates that only Building Construction and Architectural Coating periods of Phases 1 and 2 actually overlap (roughly six months of overlap in Phase 1 and nine months of overlap in Phase 2). To contrast, *Table 3-5* gives the impression that each phase overlaps with the next as one phase will end and the next begins during the same month. The CalEEMod sheets indicate that even though two phases may occur during one month, activity during one phase will end on a certain day and the next phase will begin the following day, resulting in no actual overlap of phases or analysis of overlap.

The construction schedule presented in *Table 3-5* gives an incorrect assumption to the reader that all construction phases were analyzed for overlap of emissions. *Table 3-5 Construction Duration* must be revised to accurately depict the construction schedule analyzed in the CalEEMod sheets which only analyzes two potential overlap scenarios. Burying this information in the technical appendix does not comply with CEQA's requirements for meaningful disclosure.

Further, the methodology does not clearly state if the construction of the Fire Station and School or the alternative residential units were analyzed in the AQA. The CalEEMod sheets indicate that there were no public facilities included in the analysis. The methodology must be revised to clearly communicate this to the public and decision makers in order to comply with CEQA's requirements for meaningful disclosure. The EIR and AQA must also be substantially revised to include analysis of the construction/operation of a Fire Station and School as proposed in the Specific Plan.

4.2.5 Impact Analysis

CalEEMod output sheets indicate a maximum assumed 8 hour construction day and a 5 day construction week. However, San Bernardino County Development Code Section 83.01.080 (G) indicates that legal hours of construction are "7:00 a.m. to 7:00 p.m. Mondays to Fridays, with no activity allowed on Sundays and Federal holidays", which is applied in the Noise Analysis for limiting hours of construction at the project site. The air quality modeling does not present a "worst-case scenario" analysis of construction equipment emitting pollutants for the legal 12





LETTER J (Page 5 of 10)

hours per day, 6 days a week throughout the duration of project construction. The air quality modeling must be revised to account for these legally possible longer construction days and increased number of construction days.

J-11 Cont.

Threshold (a) - Consistency Criterion No. 2

Here, the EIR includes for the first time that the project proposes a breakdown of “754 single-family residential units, 244 condo/townhomes, 52 active adult attached units, a 0.8-acre fire station site, 10.3-acre elementary school, 6,500 square feet of commercial retail use, a 1,500-square foot coffee shop with drive-thru window, a 4,000-square foot fast-food restaurant with drive-thru window, 19.3 acres of recreational open space, and 199.7 acres of preserved open space”. This does not match the development proposed in the Project Description. The Project Description must be revised to include all aspects and details of the proposed development as analyzed in the EIR.

J-12

Further, the EIR states that the AQA “conservatively assumed a development scenario whereby the proposed 0.8- acre fire station site and 10.3-acre elementary school site would not be constructed, and, alternatively, 1,050 dwelling units would be constructed at the Project site”. A separate alternative AQA must be completed for the development of a Fire Station and School as part of the proposed Specific Plan, especially where analysis in other Sections of the EIR (including Public Services) rely on the determination that the “proposed on-site fire station site is an inherent part of the Project evaluated in this EIR and as such, the environmental effects associated with constructing and operating the fire station are adequately disclosed”, and similar statements are made with respect to the school facility development (Page 4.12-5).

J-13

4.2.8 Mitigation

MM 4.2-1 is not meaningfully enforceable as there is no indication of an enforcement entity or lead agency oversight that will inspect to ensure compliance with this requirement. There is no reporting system, documentation logs, or other method of oversight to ensure compliance with this mitigation measure. MM 4.2-1 must be revised to be meaningfully enforceable (CEQA § 21081.6 (b)).

J-14

The CalEEMod output tables of the AQA (Appendix B) included construction mitigation measures (Section 3.1 within the tables). These mitigation measures include:

J-15 Cont.



LETTER J (Page 6 of 10)

Page 6 of 10

Water Exposed Area
Clean Paved Roads

These mitigation measures are not proposed or discussed in the EIR. Each potential impact discussed in the EIR concludes by requiring only one mitigation measure. The Air Quality Analysis applied mitigation measures to reduce potential impacts without discussion in the EIR. Burying this information in technical tables of an Appendix does not comply with CEQA's requirements for meaningful disclosure.

J-15 Cont.

4.5 Geology and Soils

The EIR states that the Rialto-Colton Fault (two miles northeast of the site) is the nearest fault to the project, "the activity of which is unknown". The EIR concludes that because "no known active faults underlie the Project site, the Project site would not be exposed to fault rupture during a seismic event and no impact would occur". The EIR does not provide analysis, study, or supporting evidence for this statement regarding the Rialto-Colton Fault. The conclusion that there is no impact is not logical as the Rialto-Colton Fault has not been studied in relation to this project and no information about the fault is given at all. Further, the fault is not depicted on a map for public verification of the proximity to the project site. The EIR must be revised to provide analysis and supporting evidence for this conclusion regarding the Rialto-Colton Fault.

J-16

4.6 Greenhouse Gas Emissions

The EIR refers to the Colton Climate Action Plan (CCAP), which has the goal of reducing greenhouse gas emissions by at least 15% below 2008 levels by 2020. Earlier in the EIR, it is mentioned that SB 32 significantly increased the statewide GHG reduction goal to 40% below 1990 levels by 2030. The EIR does not describe how achieving emissions that are 15% below 2008 levels by 2020 will comply with SB 32. Demonstrating compliance with the CCAP does not indicate that the project will not conflict with the goals of SB 32.

J-17

4.10 Noise

4.10.3 Applicable Environmental Regulations

The EIR provides details regarding the Noise Element of the Colton General Plan. The EIR erroneously states that *Table 5.1 Land Use Compatibility for Community Noise Environments* of

J-18 Cont.



LETTER J (Page 7 of 10)

Page 7 of 10

the Noise Element “identifies guidelines to evaluate the land use compatibility of *transportation-related noise*”. The Noise Element states verbatim, “Table 5-1 describes Land Use Compatibility for *various* community noise environments. These guidelines, along with the adjustment factors given in the Noise Adjustment Reference in Table 5-2, allow the City to arrive at *acceptability standards which reflect the desires of Colton* and the City’s assessment of the relative importance of *noise pollution*”. The Noise Element does not specifically designate the noise standards for transportation-related noise. The Noise Element provides these acceptability standards for general noise pollution, which includes construction noise, and these standards should be applied in the Noise Analysis methodology.

J-18 Cont.

The methodology of the EIR applies San Bernardino County Development Code (SBCDC) Section 83.01.080 (G) which indicates that “construction noise levels are considered exempt if they occur between the hours of 7:00 a.m. to 7:00 p.m. Mondays to Fridays, with no activity allowed on Sundays and Federal holidays”. The EIR excludes the SBCDC Table 83-2 Noise Standards for Stationary Noise Sources and Table 83-3 Noise Standards for Adjacent Mobile Noise Sources because it “does not establish a numeric maximum acceptable construction source noise level for nearby potentially affected receivers which would allow for a quantified determination of what CEQA constitutes a substantial temporary or periodic noise increase”. This logic is flawed because construction equipment is quantified as mobile sources of pollution in the Air Quality Analysis. The EIR could apply the standards in the SBCDC as thresholds for construction and operational noise.

J-19

The EIR continues by applying “the construction noise level threshold of 85 dBA Leq for construction activities occurring near sensitive receptors over a period of eight hours or more adopted by the National Institute for Occupational Safety and Health (NIOSH), which represents the level at which noise may result in harm to human health. (Urban Crossroads, Inc., 2016d, p. 23)”. This is not appropriate because interior and exterior noise level standards are delineated by both the City of Colton and the County of San Bernardino, both of which have a maximum 60 dB(A) in residential areas. The methodology in the EIR skews the noise impacts of the project by employing a much higher dB(A) for analysis (85 dB(A)) instead of the applicable 60 dB(A) for residential areas delineated in both sources utilized for the Noise Analysis.

J-20

4.10.5 Methodology for Calculating Project-Related Noise Impacts

The EIR provides eight sensitive receptors near the project site for analysis. Each receptor includes their respective distance from the project site. However, the EIR does not provide

J-21 Cont.



LETTER J (Page 8 of 10)

Page 8 of 10

clarification regarding where on the property sensitive receptors were placed for modeling. A worst-case scenario analysis requires sensitive receptors to be modeled at their property lines closest to the project site. The EIR must be revised to clarify if sensitive receptors were placed at their property lines for modeling.

J-21 Cont.

An additional receptor should be added to evaluate the potential impacts to Maryknoll Terrace Apartments located at 2654-2686 South Rosedale Ave., which is adjacent to the proposed commercial center. Further, an additional receptor should be added for each Coyote Drive and Lomita Lane, both of which are adjacent to the project site. A receptor which is located between R7 and R8 must be added as well because these homes are adjacent to a residential construction site (unlike R7 which is adjacent to open space) and appear to have a smaller green space buffer than R8, thus making them more susceptible to impacts than either of the receptors chosen for analysis.

J-22

4.10.9 Mitigation

Mitigation Measures 4.10-1(A-D) are unenforceable as the information will be included as notes on the project plans. There is no enforcement entity or field verification component of these notes specified. MM 4.10-1(A-D) must be revised in order to be meaningfully enforceable, such as sending notice to adjacent property owners regarding an enforcement contact for noncompliance/noise complaints or posting signs with such contact information in areas at the project site which are easily accessible to the public (CEQA § 21081.6 (b)). Also, the construction contractor should be required to respond and investigate complaints as part of MM-4.10-1(A-D). Additional oversight and communication with City of Colton as the lead agency should be added to MM 4.10-1(A-D) to ensure that complaints are addressed and enforced within a timely manner by including a City of Colton contact for complaints in addition to the construction contractor.

J-23

Figure 4.10.2 Construction Activity Locations

The figure should be revised to label the proposed construction staging areas. This enables the public and decision-makers to verify compliance with MM 4.10-1(C) which requires the construction equipment staging areas to be located a minimum of 100 feet away from sensitive receptors.

J-24



LETTER J (Page 9 of 10)

Page 9 of 10

Figure 4.10.3 Operational Noise Sources

The figure's inset is completely illegible. The lines cross over one another, the numbers overlap, and it is unclear which distance belongs to which item. The inset should be recreated as a separate figure that clearly depicts the intended information.

J-25

4.12 Public Services

Threshold (a) - Fire Protection

The EIR concludes that "should the CFD elect not to develop a fire station facility within the proposed on-site area, there would be inadequate fire protection services available to serve the future demand of the Project in accordance with the Department's performance standards (CFD, 2016, n.p.)." However, a determination of significance is not made in Section 4.12.6. This section does not contemplate the event in which an on-site Fire Station is not constructed. Section 4.12.6 must be revised to make a significant finding due to the potential event that the on-site Fire Station is not constructed.

J-26

Further, the statement that the "proposed on-site fire station site is an inherent part of the Project evaluated in this EIR and as such, the environmental effects associated with constructing and operating the fire station are adequately disclosed" must be revised to accurately state that Air Quality Analysis for the construction and operation of a Fire Station has not been completed for the proposed project.

J-27

Threshold (c) - Schools

The statement that the "there are no components of the planned on-site public facilities that would result in impacts that have not already been addressed within this EIR" must be revised to accurately state that Air Quality Analysis for the construction and operation of a School has not been completed for the proposed project.

J-28

Conclusion

For the foregoing reasons, Golden State Environmental and Social Justice Alliance believes the EIR is flawed and an amended EIR must be prepared for the proposed project and circulated for public review. Golden State Environmental and Social Justice Alliance requests to be added to

J-29 Cont.



LETTER J (Page 10 of 10)

Page 10 of 10

the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental and Social Justice Alliance 160 W. Foothill Parkway Ste. 105-92 Corona, CA 92882.

Sincerely,



J. Fur

Golden State Environmental and Social Justice Alliance

J-29 Cont.



Golden State Environmental & Social Justice Alliance – Comment Letter J

J-1:

The City acknowledges Golden State Environmental and Social Justice Alliance (GSESJA) for reviewing the DEIR and providing comments. The responses to GSESJA's comments are provided below.

J-2:

GSESJA will be added to the City's mailing list for all relevant notices regarding subsequent environmental documents, public notices, public hearings, and notices of determination for the Project. The contact information for the commenter is noted.

J-3:

The commenter accurately summarizes the proposed Project's key components as described in the DEIR Section 3.0, *Project Description*.

J-4:

The DEIR analyzes the Project's impacts assuming the respective worst-case scenario for each issue area. Specifically, the DEIR analyzes the Project's impacts under the issue areas of air quality, greenhouse gas emissions, noise, and transportation/traffic assuming Planning Areas 12 and 13 would be developed with residential land uses. This assumption was used because development of Planning Areas 12 and 13 with residential land uses would generate more off-site vehicle trips than the development of these Planning Areas with a school and fire station, and therefore the analyses of residential development represents the worst-case scenario in the context of these four issue areas. In all respects, the DEIR evaluates the worst-case scenario that would result in the greatest extent of physical environmental impacts. The alternative scenarios for Planning Areas 12 and 13 are clearly disclosed in DEIR Section 3.0, *Project Description*. No revisions to the DEIR are warranted in response to this comment.

J-5:

DEIR Section 3.0, *Project Description*, has been revised in the Final EIR to state that Phase I of the proposed Project's construction would include demolition and removal of the existing on-site Roquet Paving Company facility structures and associated improvements. The environmental impacts associated with the construction of the proposed Project, including the demolition and removal of the on-site components, were thoroughly evaluated throughout the DEIR, including Subsection 4.2, *Air Quality*, 4.4, *Cultural Resources*, 4.6, *Greenhouse Gas Emissions*, 4.7, *Hazards and Hazardous Materials*, 4.14, *Transportation and Traffic*, and 4.15, *Utilities and Service Systems*. This revision is a restatement of information provided elsewhere in the DEIR and does not constitute new information or change the DEIR's significance conclusions. The revisions made to address this comment are indicated in Table F-2, *Errata Table of Additions, Corrections, and Revisions*.



Furthermore, based on the square footage of the existing improvements on the southeast portion of the Project site (approximately 3,800 square feet of building space and four [4] construction trailers), demolition of the Project site would result in a total volume of approximately 175 tons of construction debris that would require approximately 21 one-way truck haul trips. As the Air Quality and Greenhouse Gas Impact Analysis included an evaluation of the air quality and GHG emissions that would be generated by the demolition of on-site improvements, the 21 one-way truck haul trips were accounted for in the analysis of construction related air quality and GHG emissions. Furthermore, as discussed in EIR Subsection 4.14, *Transportation and Traffic*, traffic during the Project's construction phase was not analyzed in the DEIR because based on the construction characteristics identified in Section 3.0, *Project Description*, the volume of construction-related traffic (including the 21 one-way truck haul trips associated with demolition activities) would result in far fewer peak hour and daily vehicular trips when compared to those that would result from operation of the Project; thus, analysis of the Project's operational traffic represents a worst-case analysis of the potential for traffic impacts.

J-6:

The list of cumulative projects listed in DEIR Table 4.0-1, *Cumulative Projects List*, was prepared by the Lead Agency (City of Colton) based on criteria disclosed in Section 4.0 of the DEIR. The jurisdictions that were considered in the cumulative study area were selected because they are located in the southwestern area of San Bernardino County and northwestern area of Riverside County and have similar environmental characteristics as the Project area. The study area has historically been used for rural uses, but has in recent decades been developed for residential and non-residential developments ranging from rural to higher densities. The study area exhibits similar characteristics in terms of climate, geology, and hydrology, and therefore is also likely to have similar biological and archaeological characteristics as well. Finally, the study area also encompasses the service areas of the Project site's primary public service and utility providers. No projects were identified within the cities of Jurupa Valley, Fontana, Moreno Valley or within the unincorporated community of Bloomington that are reasonably foreseeable development projects which are either approved or being processed concurrently in the study area in determining the cumulative projects list; therefore, no revisions to the DEIR are warranted. Further, and as explained in DEIR Section 4.0, the cumulative development projects listed in DEIR Table 4.0-1 are used only for the evaluation of cumulatively-considerable impacts pertaining to the subject areas of traffic and vehicular-related air quality, greenhouse gas, and noise. For all other issue areas evaluated in the DEIR, the cumulative impact analyses rely on the summary of projections approach pursuant to CEQA Guidelines §15130(b), and not the list of development projects listed in Table 4.0-1.

J-7:

Table 4.0-1 identifies the project name and/or case number, description of the proposed land use(s), and expected intensity of land use(s) presented in terms of square footage, acreage, and/or number of residential dwelling units. DEIR Figure 4.0-1 depicts the location of each of the cumulative development projects in relation to the Project site. Thus, the City finds that the information provided in Table 4.0-1 and Figure 4.0-1 adequately identifies the location and name of each cumulative development project, while Figure 4.0-1 depicts the distance from the Project site. The information in



Table 4.0-1 and Figure 4.0-1 provide the level of detail necessary to evaluate potential cumulatively-considerable impacts to traffic and vehicular-related air quality, greenhouse gas, and noise. Adequate information is provided for meaningful disclosure and no revisions to the DEIR are warranted pursuant to this comment. Nonetheless, in order to be responsive to this comment, DEIR Table 4.0-1 has been revised to include additional data, where available, regarding each of the cumulative projects. The revisions to DEIR Table 4.0-1, *Cumulative Projects List*, are located in Section F-3 of the Final EIR.

J-8:

The DEIR Subsection 4.2, *Air Quality*, identifies maximum daily construction-related emissions that are expected to occur as a result of Project implementation. Refer to DEIR Table 4.2-5 for a summary of the quantification. Several construction phases are discussed and a number of equipment types have been modeled in the Project-specific Air Quality Impact Analysis (EIR *Technical Appendix B*) and disclosed in the DEIR, Subsection 4.2. As noted in the Project-specific Air Quality Impact Analysis (EIR *Technical Appendix B*) (Urban Crossroads, Inc., 2016a, p. 25):

“The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA guidelines. Site specific construction fleet may vary due to specific project needs at the time of construction.”

As such, although a specific “demolition” phase may not have been explicitly modeled in the air quality modeling, the maximum daily emissions summarized in the DEIR would not be exceeded by any potential demolition activity as any demolition activity would require a fewer number of equipment pieces and consequently produce fewer emissions than the peak construction activities evaluated in the Project-specific Air Quality Impact Analysis (EIR *Technical Appendix B*) and disclosed in the DEIR. Moreover, demolition activities were considered as a component of the CalEEMod modeling during the site preparation sub-phase of the construction period in the Air Quality Impact Analysis included as *Technical Appendix B* of the DEIR.

Based on the foregoing, no revisions to the Project-specific Air Quality Impact Analysis or the DEIR are necessary.

J-9:

The DEIR identifies the maximum daily construction-related emissions that are expected to occur with development of the Project. As shown in Table 3-5, *Construction Duration*, of the DEIR, the specific modeled days of construction activity are clearly presented, although Table 3-5 does give an assumption to the reader that all construction phases were analyzed for overlap of emissions. Notwithstanding, as noted in the Air Quality Impact Analysis (Urban Crossroads, Inc., 2016a, p. 25) included as *Technical Appendix B* of the DEIR:

“The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet as required per CEQA guidelines. Site specific construction fleet may vary due to specific project needs at the time of construction.”



As shown in DEIR Table 3-5, the potential overlapping construction activity results in the analysis of nearly 20 pieces of heavy-duty construction equipment simultaneously operating on a daily basis for eight (8) working hours, which is a very conservative assumption relative to what will likely occur in actuality based on typical construction practices. Construction equipment operators turn equipment on and off throughout the day and use different pieces of equipment at different times depending on the type of work being conducted in a particular day; thus, the likelihood of 20 pieces of heavy-duty equipment being used non-stop on the Project for 8 hours in any single day is unlikely and the analysis of such presented in the DEIR overstates the air emission impact that would likely occur. As such, the DEIR and Project-specific Air Quality Impact Analysis (EIR *Technical Appendix B*) are extremely conservative and account for the potential of any overlapping construction activity. Moreover, as stated in DEIR at page 4.2-15, DEIR, while the project is proposed to be built out by the end of 2020, the exact timing of implementation for any given phase may vary based on a number of facts; thus, it is impossible to determine which portions of the project would be operation while other portions of the project site would be under construction.

Based on the foregoing, no revisions to the Project-specific Air Quality Impact Analysis or the DEIR are necessary.

J-10:

As stated on page 4.2-17 of the DEIR, the Project-specific air quality impact analysis (EIR *Technical Appendix B*) conservatively assumed a development scenario whereby a proposed fire station on a 0.8-acre site (Planning Area 13) and proposed elementary school on a 10.3-acre site (Planning Area 12) would not be constructed, and, alternatively, a maximum total of 1,050 dwelling units would be constructed at the Project site, with residential development occurring within Planning Areas 12 and 13. The air quality impact analysis included as Technical Appendix B of the DEIR assumed Planning Areas 12 and 13 would be developed with medium density residential land uses because this alternative represents the worst-case scenario with regard to air quality impacts due to higher vehicle trip generation. Since the use of this methodology is clearly stated in subsection 4.2.3 of DEIR Subsection 4.2, *Air Quality*, no revisions to the DEIR are necessary to respond to this comment.

J-11:

As noted in the Project-specific Air Quality Impact Analysis (EIR *Technical Appendix B*), the duration of construction activity represents a reasonable approximation of the expected construction duration as required per CEQA guidelines. Table 3-3 of the Project's Air Quality Impact Analysis (DEIR *Technical Appendix B*) and Table 3-4 of the DEIR (p. 3-27) identify the construction equipment assumptions used in the analysis. While the commenter is correct that construction activities are legally permitted to occur up to 12 hours per day pursuant to applicable regulatory requirements, the identified construction equipment would not be used during every hour of the day. Rather, the Air Quality Impact Analysis, consistent with industry standards and typical construction practices, assumes that each piece of equipment listed in DEIR Table 3-4 would operate up to 8 total hours per day, or approximately 2/3 of the period during which construction activities are allowed pursuant to regulatory requirements. For example, during grading operations water trucks would not operate continuously over a 12-hour period,



but would instead be used as necessary to minimize fugitive dust. In fact, most pieces of equipment likely would operate for fewer hours per day than indicated in DEIR Table 3-4. Accordingly, the City finds that the assumptions used in the Project's Air Quality Impact Analysis (DEIR *Technical Appendix B*) and the DEIR properly disclose a reasonable, and likely overstated evaluation of the Project's potential impacts due to air quality emissions; no revision to the Air Quality Impact Analysis (DEIR *Technical Appendix B*) or DEIR is warranted pursuant to this comment. Therefore, no revisions to the DEIR are warranted with respect to this comment.

J-12:

The first page, second paragraph of DEIR Section 3.0, *Project Description* (DEIR p. 3-1) discloses that the Project site is proposed to be developed with both detached homes and attached townhomes, as well as retail (neighborhood commercial) and recreational land uses and a potential fire station and elementary school. This information is carried through DEIR Section 3.0. DEIR Subsection 4.2, *Air Quality*, provides additional details regarding the housing product type permitted in residential planning areas under the Specific Plan, as well as a reasonable assumption based on the specific uses that are allowed under the neighborhood commercial land use designation (pursuant to Section VI, *Zoning Ordinance*, of the Roquet Ranch Specific Plan) in order to disclose the assumptions used in the Air Quality Impact Analysis (EIR *Technical Appendix B*) for air quality impact modeling purposes. Additionally, as discussed on page 4.2-17 of the DEIR, the Project-specific Air Quality Impact Analysis (EIR *Technical Appendix B*) conservatively assumed a development scenario whereby the proposed 0.8-acre fire station site and 10.3-acre elementary school site would instead be developed with residential uses because residential development would produce more traffic trips and thus more vehicular-related air emissions. Because air quality emissions during operation are primarily associated with vehicular trips and because the residential uses of the fire station and elementary school sites would generate the most number of trips, the Air Quality Impact Analysis utilized reasonable assumptions in the analysis that demonstrate a worst-case scenario in regards to impacts to air quality. Table 4-2 (2), *Project Trip Generation Summary*, has been attached to this FEIR as Attachment C and demonstrates that development of Planning Area 12 with an elementary school would generate 560 fewer daily vehicle trips compared to the medium density residential land use summary assumed for Planning Area 12 that was analyzed throughout the DEIR. Accordingly, the DEIR's Section 3.0, *Project Description*, is accurate, stable, and consistent with the project description information provided in EIR Subsection 4.2, *Air Quality*. Thus, no revisions to the DEIR are necessary with respect to this comment.

J-13:

Please see response to comment J-10. A separate air quality analysis is not required for the fire station and elementary school development alternatives because the development of these planning areas (Planning Areas 12 and 13) with single family residential uses represents the worst-case scenario in regards to air quality emissions. As such, the Project-specific Air Quality Impact Analysis (EIR *Technical Appendix B*) and DEIR Subsection 4.1, *Air Quality*, disclose emission calculations associated with the most impactful development scenario for the Project site. If the fire station and elementary school were to be constructed, this would result in a lesser quantity of air pollutant



emissions compared to what has already been disclosed in the DEIR. Accordingly, no revisions to the DEIR are necessary with regard to this comment.

J-14:

In response to this comment, Mitigation Measure MM 4.2-1 has been revised in the Final EIR to better ensure enforcement. Mitigation Measure MM 4-2-1 as revised specifically requires Project contractors to ensure compliance with the notes listed on the grading plans, and further stipulates that contractors must permit inspection of the construction site by City of Colton staff or its designees to confirm compliance. The required mitigation also specifically requires that the grading plan notes be specified in bid documents issued to prospective construction contractors. Any construction contractor that does not abide by the notes on the grading plan would be in breach of contract, which represents a strong disincentive to violate the identified requirements. Additionally, because the City of Colton or its designees must be permitted to monitor these requirements, any identified violation of the grading plan notes could potentially result in a stop-work order on construction activities at the site, or revocation of the grading permit, which also represents a strong disincentive to violate the requirements. Mitigation measures are not required under CEQA to specifically include provisions for a reporting system, documentation logs, or any other specific methods of oversight as suggested by the commenter. The City of Colton finds that the implementation of Mitigation Measure 4.2-1 as revised in the Final EIR can be adequately assured and enforced.

J-15:

The only mitigation measure recommended by the Project-specific Air Quality Impact Analysis (EIR *Technical Appendix B*) is MM AQ-1 which requires the grading contractor to ensure that all equipment greater than 150 horsepower shall be CARB Tier 3 Certified or better in order to reduce the Project's construction-related air quality impacts. The DEIR imposes this mitigation as Mitigation Measure MM 4.2-1. Furthermore, the Project-specific air quality impact analysis (EIR *Technical Appendix B*) concluded that no feasible mitigation measures exist that would substantively reduce operational-source air quality impacts to less-than-significant levels. Moreover, the proposed Project is required to water exposed areas and clean paved roads in compliance with the mandatory requirements of California Air Resources Board Rule 403. This explains why these requirements are assumed by the CalEEMod output tables of the Air Quality Impact Analysis, as this comment accurately notes. Therefore, the addition of supplemental or duplicative mitigation measures is not necessary, and no revisions to the DEIR are warranted with respect to this comment.

J-16:

The conclusion under Threshold a of EIR Subsection 4.5, *Geology and Soils*, that the Project site would not be exposed to fault rupture during a seismic event, is supported by the analysis, conclusions, and substantial evidence provided in the site-specific geotechnical report (EIR *Technical Appendix G*) regarding fault rupture hazards at the Project site. Page 11 of the site-specific geotechnical report (EIR *Technical Appendix G*) states that the Project site is not located within an Alquist-Priolo Earthquake Fault Zone nor is it located within a County of San Bernardino Earthquake Fault Zone (LAI, 2014, p. 11). Additionally, Figure 3 of the site-specific geotechnical report (EIR *Technical Appendix G*) depicts



earthquake faults in the vicinity of the Project site, showing the Rialto-Colton fault located approximately 2.0 miles northwest of the Project site. Further, no earthquake faults were discovered on the Project site during the geotechnical work summarized in EIR *Technical Appendix G*. Based on this substantial evidence, the analysis regarding fault rupture included in the DEIR relied on substantial evidence that no impact would occur based on the supporting technical report. The commenter does not introduce substantial evidence that refutes the conclusion reached in the DEIR.

J-17:

As described in *Center for Biological Diversity v. California Department of Fish and Wildlife* (“Newhall”) (2015) 62 Cal.4th 204, 229-30, compliance with laws and regulations for the reduction of GHG emissions, compliance with Sustainable Communities Strategies adopted by regional transportation agencies such as the Southern California Council of Governments (SCAG) pursuant to SB 375 plan, and compliance climate actions plans adopted by lead agencies, are all appropriate pathways for assessing the significance of project-related GHG emissions. As described in the EIR, the project must comply with applicable regulatory requirements and complies with the City of Colton Climate Action Plan, and the CARB-approved SCAG RTP/SCS (EIR, pp. 4.6-33 through 4.6-68).

In *Newhall*, the California Supreme Court (Court) considered how GHG emissions should be addressed in an EIR for a large-scale development project in Los Angeles County. The Court identified “potential pathways to compliance” pursuant to which such an analysis could be adequate. *Id.*, 62 Cal. 4th at page 229. “[A] lead agency might assess consistency with A.B. 32’s goal in whole or part by looking to compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities.” *Id.* An agency may also make use of adopted “metropolitan regional ‘sustainable communities strategies’” authorized by SB 375 to streamline analysis. *Id.*, 62 Cal. 4th at page 230. Jurisdictions may “develop ‘climate action plans’ . . . for their geographic areas . . . as tools for CEQA streamlining.” *Id.* Finally, “a lead agency may rely on existing numerical thresholds of significance for greenhouse gas emissions.” *Id.*

The “compliance with laws and regulations” CEQA compliance pathway was addressed in the EIR under Threshold b of Section 4.6, Greenhouse Gas Emissions. In addition to laws and regulations already approved, California is a global leader in adopting laws and regulations that have substantially reduced per capita GHG and, as the CARB has concluded in its most recent approved Scoping Plan under AB 32 (California Air Resources Board, First Update to the Climate Change Scoping Plan: Building On the Framework (“CARB Scoping Plan”), approved by CARB in May, 2014), place us on a trajectory of ongoing substantial reductions in GHG including achievement of Executive Order goals of reducing GHG from the transportation sectors and the overall economy (CARB Scoping Plan at page ES1). California’s global leadership role in mandating GHG reductions with prescriptive new legal mandates was again confirmed in 2016, when the state enacted SB 32 (established a GHG reduction mandate to be achieved by 2030) and AB 197 (directing that priority in GHG reduction efforts be directed to industrial facilities and vehicles). This new SB 32 2030 GHG reduction mandate is the same as the GHG reduction target included in Executive Order B-30-15 of 40 percent below 1990 levels by 2030. The current CARB Scoping Plan included a framework for setting the 2030 target



(CARB Scoping Plan at pages ES5, 34, 44.), which is now being used by CARB in establishing the GHG reduction measures to be included in a second update to the Scoping Plan. (See CARB’s Scoping Plan website, available at: <https://www.arb.ca.gov/cc/scopingplan/scopingplan.htm>.)

The “compliance with SB 375 plan” CEQA compliance pathway was addressed in the EIR and under Threshold a of Section 4.6. Although there is no legal mandate that cities or counties prepare local climate action plans, The City of Colton has nevertheless adopted such a plan, the CAP. The Project consistency with the CAP was therefore also addressed in the EIR under Threshold a.

This first pathway is based on describing how various components of the project are required to reduce GHG emissions based on adopted laws and regulations designed to achieve emissions reductions required under AB 32 and under other greenhouse gas reduction laws and regulations.

As the *Newhall* Court noted:

[A] lead agency might assess consistency with A.B. 32’s goal in whole or part by looking to compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities...To the extent a project’s design features comply with or exceed the regulations outlined in the Scoping Plan and adopted by the Air Board or other state agencies, a lead agency could appropriately rely on their use as showing compliance with “performance based standards” adopted to fulfill “a statewide...plan for reduction or mitigation of greenhouse gas emissions.”

(*Newhall*, 62 Cal. 4th, at pages 264-265.)

The following Table summarizes laws and regulations requiring GHG reductions that affect project greenhouse gas emissions at the construction or operational phases. Legal mandates to reduce greenhouse gas emissions from vehicles, for example, reduce project-related vehicular emissions. Legal mandates to reduce greenhouse gas emissions from the energy production sector that will serve the project likewise reduce project-related GHG emissions from electricity consumption. Legal mandates to reduce per capita and per household water consumption, improve household and appliance energy efficiency, and impose waste management standards to reduce methane and other greenhouse gases from solid wastes, are all examples of greenhouse gas reduction mandates that reduce greenhouse gas emissions below what would have been required under the laws and regulations in effect as of 2008 (“business as usual”). The following table identifies laws and regulation currently in effect that reduce GHG emissions from project-related GHG emissions:

Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Building Components/Facility Operations		



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Roofs/Ceilings/Insulation	<p>CalGreen Building Code (Title 24, Part 11, “CalGreen”)</p> <p>Building Energy Efficiency Standards (Title 24, Part 6)</p>	<p>The Project must comply with efficiency standards regarding roofing, ceilings, and insulation. For example:</p> <p>Roofs/Ceilings: New construction must reduce roof heat island effects per CalGreen Building Code section 106.11.2, which requires use of roofing materials having a minimum aged solar reflectance, thermal emittance complying with section A5.106.11.2.2 and A5.106.11.2.3 or a minimum aged Solar Reflectance Index (SRI) as specified in Tables A5.106.11.2.2, or A5.106.11.2.3. Roofing materials must also meet solar reflectance and thermal emittance standards contained in Title 20 Standards.</p> <p>Roof/Ceiling Insulation: There are also requirements for the installation of roofing and ceiling insulation. (See Title 24, Part 6 Compliance Manual at Section 3.2.2.)</p>
Flooring	CalGreen	<p>The Project must comply with efficiency standards regarding flooring materials. For example, for 80 percent of floor area receiving “resilient flooring,” the flooring must meet applicable installation and material requirements contained in CalGreen section 5.504.4.6.</p>
Window and Doors (Fenestration)	Title 24, Part 6	<p>The Project must comply with fenestration efficiency requirements. For example, the choice of windows, glazed doors, and any skylights for the Project must conform to energy consumption requirements affecting size, orientation, and types of fenestration products used. (See Title 24, Part 6 Compliance Manual, Section 3.3.)</p>



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Building Walls/Insulation	CalGreen California Energy Code Title 24, Part 6	<p>The Project must comply with efficiency requirements for building walls and insulation.</p> <p><u>Exterior Walls:</u> Must meet requirements in current edition of California Energy Code, and comply with sections A5.106.7.1 or A5.106.7.2 of CalGreen Building code for wall surfaces, as well as section 5.407.1, which required weather-resistant exterior wall and foundation envelope as required by California Building Code section 1403.2. Construction must also meet requirements contained in Title 24, Part 6, which vary by material of the exterior walls. (See Title 24, Part 6 Compliance Manual, Part 3.2.3.)</p> <p><u>Demising (Interior) Walls:</u> Mandatory insulation requirements for demising walls (which separate conditioned from non-conditioned space) differ by the type of wall material used. (Id. at 3.2.4.)</p> <p><u>Door Insulation:</u> There are mandatory requirements for air infiltration rates to improve insulation efficiency; they differ according to the type of door. (Id. at 3.2.5.)</p> <p><u>Flooring Insulation:</u> There are mandatory requirements for insulation that depend on the material and location of the flooring. (Id. at 3.2.6.)</p>
Finish Materials	CalGreen	<p>The Project must comply with pollutant control requirements for finish materials. For example, materials including adhesives, sealants, caulks, paints and coatings, carpet systems, and composite wood products must meet requirements in CalGreen to ensure pollutant control. (CalGreen section 5.504.4.)</p>



Project Component	Applicable Laws/Regulations	GHG Reduction Measures Required for Project
<p>Wet Appliances (Toilets/Faucets/Urinals, Dishwasher/Clothes Washer, Spa and Pool/Water Heater)</p>	<p>CalGreen California Energy Code Title 24, Part 6 Appliance Efficiency Regulations (“Title 20 Standards”)</p>	<p>Wet appliances associated with the Project must meet various efficiency requirements. For example:</p> <p><u>Spa and Pool:</u> Use associated with the Project is subject to appliance efficiency requirements for service water heating systems and equipment, spa and pool heating systems and equipment. (Title 24, Part 6, Sections 110.3, 110.4, 110.5; Title 20 Standards, Sections 1605.1(g), 1605.3(g); see also California Energy Code.)</p> <p><u>Toilets/Faucets/Urinals:</u> Use associated with the Project is subject to new maximum rates for toilets, urinals, and faucets effective January 1, 2016:</p> <ul style="list-style-type: none"> • Showerheads maximum flow rate 2.5 gpm at 80 psi • Wash fountains 2.2 x (rim space in inches/20) gpm at 60 psi • Metering faucets 0.25 gallons/cycle • Lavatory faucets and aerators 1.2 gpm at 60 psi • Kitchen faucets and aerators 1.8 gpm with optional temporary flow of 2.2 gpm at 60 psi • Public lavatory faucets 0.5 gpm at 60 psi • Trough-type urinals 16 inches length • Wall mounted urinals 0.125 gallons per flush • Other urinals 0.5 gallons per flush (Title 20 Standards, Sections 1605.1(h),(i) 1065.3(h),(i).) <p><u>Water Heaters:</u> Use associated with the Project is subject to appliance efficiency</p>



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		<p>requirements for water heaters. (Title 20 Standards, Sections 1605.1(f), 1605.3(f).)</p> <p><u>Dishwasher/Clothes Washer:</u> Use associated with the Project is subject to appliance efficiency requirements for dishwashers and clothes washers. (Title 20 Standards, Sections 1605.1(o), (p), (q), 1605.3(o), (p), (q).)</p>
Dry Appliances (Refrigerator/Freezer, Heater/Air Conditioner, Clothes Dryer)	Title 20 Standards CalGreen	<p>Dry appliances associated with the Project must meet various efficiency requirements. For example:</p> <p><u>Refrigerator/Freezer:</u> Use associated with the Project is subject to appliance efficiency requirements for refrigerators and freezers. (Title 20 Standards, Sections 1605.1(a), 1605.3(a).)</p> <p><u>Heater/Air Conditioner:</u> Use associated with the Project is subject to appliance efficiency requirements for heaters and air conditioners. (Title 20 Standards, Sections 1605.1(b),(c),(d),(e), 1605.3(b),(c),(d),(e) as applicable.)</p> <p><u>Clothes Dryer:</u> Use associated with the Project is subject to appliance efficiency requirements for clothes dryers. (Title 20 Standards, Section 1605.1(q).)</p>



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
	CalGreen	Installations of HVAC, refrigeration and fire suppression equipment must comply with CalGreen Sections 5.508.1.1 and 508.1.2, which prohibits CFCs, halons, and certain hydrochlorofluorocarbons and hydrofluorocarbons.
Lighting	Title 20 Standards	<p>Lighting associated with the Project will be subject to energy efficiency requirements contained in Title 20 Standards.</p> <p><u>General Lighting:</u> Indoor and outdoor lighting associated with the Project must comply with applicable appliance efficiency regulations (Title 20 Standards, Sections 1605.1(j),(k),(n), 1605.3(j),(k),(n).)</p> <p><u>Emergency lighting and self-contained lighting</u> associated with the Project must also comply with applicable appliance efficiency regulations (Title 20 Standards, Sections 1605.1(l), 1605.3(l).)</p> <p><u>Traffic Signal Lighting:</u> For any necessary Project improvements involving traffic lighting, traffic signal modules and traffic signal lamps will need to comply with applicable appliance efficiency regulations (Title 20 Standards, Sections 1605.1(m), 1605.3(m).)</p>
	Title 24, Part 6	Lighting associated with the Project will also be subject to energy efficiency requirements contained in Title 24, Part 6, which contains energy standards for non-residential indoor



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		<p>lighting and outdoor lighting. (See Title 24 Part 6 Compliance Manual, at Sections 5, 6.)</p> <p>Mandatory lighting controls for indoor lighting include, for example, regulations for automatic shut-off, automatic daytime controls, demand responsive controls, and certificates of installation. (Id. at Section 5.) Regulations for outdoor lighting include, for example, creation of lighting zones, lighting power requirements, a hardscape lighting power allowance, requirements for outdoor incandescent and luminaire lighting, and lighting control functionality. (Id. at Section 6.)</p>
	<p>Assembly Bill 1109</p>	<p>Lighting associated with the Project will be subject to energy efficiency requirements adopted pursuant to AB 1109.</p> <p>Enacted in 2007, AB 1109 required the CEC to adopt minimum energy efficiency standards for general purpose lighting, to reduce electricity consumption 50 percent for indoor residential lighting and 25 percent for indoor commercial lighting.</p>
<p>Bicycle and Vehicle Parking</p>	<p>CalGreen</p>	<p>The Project will be required to provide compliant bicycle parking, fuel- efficient vehicle parking, and electric vehicle charging spaces (CalGreen sections 5.106.4, 5.106.5.1, 5.106.5.3)</p>
	<p>Title 24, Part 6</p>	<p>The Project is also subject to parking requirements contained in Title 24, Party 6. For example, parking capacity is to meet but not exceed minimum local zoning requirements, and the Project should employ approved strategies to reduce parking capacity (Title 24, Part 6, section 106.6)</p>



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Landscaping	CalGreen	<p>The CalGreen Building Code requires and has further voluntary provisions for:</p> <ul style="list-style-type: none">- A water budget for landscape irrigation use;- For new water service, separate meters or submeters must be installed for indoor and outdoor potable water use for landscaped areas of 1,000- 5,000 square feet;- In, non-residential projects with 1,000-2,000 square feet of landscaped areas, install irrigation controllers and sensors that follow specified criteria;- Provide water-efficient landscape design that reduces use of potable water beyond initial requirements for plant installation and establishment
	Executive Order B-29-15	<p>The Project is also subject to emissions reduction requirements to be achieved by implementation of Executive Order B-29-15.</p> <p>This emergency executive order directs the Department of Water Resources to lead a statewide initiative to replace 50 million square feet of lawns and ornamental turf with drought tolerant landscapes.</p> <p>The order also directed the departments to update the Model Water Efficient Landscaping Ordinance, which they did in 2015.</p>
	Model Water Efficient Landscaping Ordinance	<p>The model ordinance promotes efficient landscaping in new developments and establishes an outdoor water budget for new and renovated landscaped areas that are 500 square feet or larger. (California Code of Regulations, Title 23, Division 2, Chapter 2.7.)</p>



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
	Cap-and-Trade Program	Transportation fuels used in landscape maintenance equipment (e.g., gasoline) would be subject to the Cap-and-Trade program. (See “Energy Use,” below.)
Refrigerants	CARB Management of High Global Warming Potential Refrigerants for Stationary Sources	Any refrigerants associated with the Project will be subject to CARB standards. CARB’s Regulation for the Management of High Global Warming Potential Refrigerants for Stationary Sources 1) reduces emissions of high-Global Warming Potential refrigerants from leaky stationary, non-residential refrigeration equipment; 2) reduces emissions resulting from the installation and servicing of stationary refrigeration and airconditioning (R/AC) appliances using high-GWP refrigerants; and 3) requires verification of greenhouse gas (GHG) emission reductions. (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5.1, Section 95380 et seq.)
Consumer Products	CARB High-Global Warming Potential Greenhouse Gases in Consumer Products	All consumer products associated with the project will be subject to CARB standards. CARB’s consumer products regulations set volatile organic compound (VOC) limits for numerous categories of consumer products, and limits the reactivity of the ingredients used in numerous categories of aerosol coating products (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 8.5.)
Construction		
Use of Off-Road Diesel Engines, Vehicles, and Equipment	CARB In-Use Off-Road Diesel Vehicle Regulation	Any relevant vehicle or machine use associated with the Project will be subject to CARB standards. The CARB In-Use-Off-Road Diesel Vehicle Regulation applies to certain off-road diesel



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		<p>engines, vehicles, or equipment greater than 25 horsepower. The regulations: 1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; 2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System, DOORS) and labeled; 3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and 4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies, VDECS (i.e., exhaust retrofits).</p> <p>The requirements and compliance dates of the Off-Road regulation vary by fleet size, as defined by the regulation.</p>
	Cap-and-Trade Program	Transportation fuels (e.g., gasoline) used in equipment operation would be subject to the Cap-and-Trade Program. (See “Energy Use,” below.)
Pollutant Control	CalGreen	If an HVAC system is used during construction, the Project must use return air filters with a MERV of 8, based on ASHRAE 52.2-1999, or an average efficiency of 30% based on ASHRAE 5.2.1-1992. All filters must be replaced immediately prior to occupancy. (CalGreen Section A5.504.1.3.)
Greening New Construction	CalGreen	<p>All new construction, including the Project, must comply with the California Green Building Code, or “CalGreen”, as discussed in more detail throughout this table.</p> <p>Adoption of the mandatory CalGreen standards for commercial construction has been essential for improving the overall environmental performance of new</p>



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		commercial buildings; it also sets voluntary targets for builders to exceed the mandatory requirements.
Construction Waste	CalGreen	The Project will be subject to CalGreen requirements for construction waste reduction, disposal, and recycling, such as a requirement to recycle and/or salvage for reuse a minimum of 50% of the non-hazardous construction waste in accordance with Section 5.408.1.1, 5.408.1.2, or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent.
Worker, vendor and truck vehicle trips (on-road vehicles)	Cap-and-Trade Program	Transportation fuels (e.g., gasoline) used in worker, vendor and truck vehicle trips would be subject to the Cap-and-Trade Program. (See “Energy Use,” below.)
Solid Waste		
Solid Waste Management	Landfill Methane Control Measure	Waste associated with the Project will be disposed per state requirements for landfills, material recovery facilities, and transfer stations. Per the statewide GHG emissions inventory, the largest emissions from waste management sectors come from landfills, and are in the form of methane. In 2010, CARB adopted a regulation that reduces emissions from methane in landfills, primarily by requiring owners and operators of certain uncontrolled municipal solid waste landfills to install gas collection and control systems, and requires existing and newly installed gas and control systems to operate in an optimal manner. The regulation allows local air districts to voluntarily enter into a memorandum of understanding with CARB to



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		implement and enforce the regulation and to assess fees to cover costs of implementation.
	Mandatory Commercial Recycling (AB 341)	<p>AB 341 will require the Project, if it generates four cubic yards or more of commercial solid waste per week, to arrange for recycling services, using one of the following: self-haul; subscribe to a hauler(s); arranging for pickup of recyclable materials; subscribing to a recycling service that may include mixed waste processing that yields diversion results comparable to source separation.</p> <p>The Project will also be subject to local commercial solid waste recycling program required to be implemented by each jurisdiction under AB 341.</p>
	CalGreen	The Project will be subject to CalGreen requirement to provide areas that serve the entire building and are identified for the depositing, storage and collection of nonhazardous materials for recycling (CalGreen Section 5.410.1)
Energy Use		
Electricity/Natural Gas Generation	Cap-and-Trade Program	<p>Electricity and natural gas usage associated with the Project will be subject to the Cap-and-Trade Program.</p> <p>The rules came into effect on January 1, 2013, applying to large electric power plants and large industrial plants. In 2015, importers and distributors of fossil fuels were added to the Cap-and-Trade program in the second phase.</p> <p>Specifically, on January 1, 2015, cap-and-trade compliance obligations were phased in for suppliers of natural gas, reformulated gasoline blendstock for oxygenate blending</p>



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		(RBOB), distillate fuel oils, and liquefied petroleum gas that meet or exceed specified emissions thresholds. The threshold that triggers a cap-and-trade compliance obligation for a fuel supplier is 25,000 metric tons or more of CO ₂ e annually from the GHG emissions that would result from full combustion or oxidation of quantities of fuels (including natural gas, RBOB, distillate fuel oil, liquefied petroleum gas, and blended fuels that contain these fuels) imported and/or delivered to California.
Energy Efficiency	Zero Net Energy Buildings (Title 24, Part 6)	The Project will be subject to net energy construction requirements contained in Title 24, Part 6. California revised building energy efficiency requirements contained in Title 24 in 2014 to require that all residential buildings be Zero Net Energy by 2020, and all commercial buildings must follow suit by 2030.



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
Renewable Energy	California Renewable Portfolio Standards (RPS) (Senate Bill X1-2 and 350)	<p>Energy providers associated with the Project will be required to comply with Renewable Portfolio Standards set by SB X1-2 and 350. SB X1-2 requires IOUs, POUs, and ESPs to increase purchases of renewable energy such that at least 33% of retail sales are procured from renewable energy resources by December 31, 2020. In the interim each entity was required to procure an average of 20% of renewable energy for the period of January 1, 2011 through December 31, 2013; and will be required to procure an average of 25% by December 31, 2016, and 33% by 2020. Senate Bill 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from eligible renewable energy resources by 2030.</p>
	Million Solar Roofs Program (Senate Bill 1)	<p>The Project will participate in California's energy market, which is affected by implementation of the Million Solar Roofs Program.</p> <p>As part of Governor Arnold Schwarzenegger's Million Solar Roofs Program, California has set a goal to install 3,000 megawatts of new, solar capacity by 201. The Million Solar Roofs Program is a ratepayer-financed incentive program aimed at transforming the market for rooftop solar systems by driving down costs over time.</p>



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
	<p>California Solar Initiative- Thermal Program</p>	<p>The Project will participate in California’s energy market, which is affected by implementation of the California Solar Initiative -Thermal Program. The program offers cash rebates of up to \$4,366 on solar water heating systems for single-family residential customers. Multifamily and Commercial properties qualify for rebates of up to \$800,000 on solar water heating systems and eligible solar pool heating systems qualify for rebates of up to \$500,000. Funding for the CSI-Thermal program comes from ratepayers of PG&E, SCE, SoCalGas, and SDG&E. The rebate program is overseen by the California Public Utilities Commission as part of the California Solar Initiative.</p>
	<p>Waste Heat and Carbon Emissions Reduction Act (AB 1613, AB 2791)</p>	<p>The Project will participate in California’s energy market, which is affected by implementation of the Waste Heat and Carbon Emissions Reduction Act. Originally enacted in 2007 and amended in 2008, this act directed the CEC, PUC, and CARB to implement a program that would encourage the development of new combined heat and power systems in California with a generating capacity of not more than 20 megawatts, to increase combined heat and power use by 30,000 GWh. The CPUC publicly owned electric utilities, and CEC duly established policies and procedures for the purchase of electricity from eligible combined heat and power systems.</p> <p>CEC guidelines require combined heat and power systems to be designed to reduce waste energy; have a minimum efficiency of 60 percent; have NOx emissions of no more than 0.07 pounds per megawatt-hour; be sized to meet eligible customer generation thermal</p>



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		load; operate continuously in a manner that meets expected thermal load and optimizes efficient use of waste heat; and be cost effective, technologically and feasible, environmentally beneficial.
Vehicle/Mobile Sources		
General	SB 375 and SCAG RTP/SCS	The Project complies with, and is subject to, the SCAG adopted RTP/SCS, which CARB approved as meeting its regional GHG targets in 2016.
Fuel	Low Carbon Fuel Standard (LCFS)/ Executive Order S-01-07	Auto trips associated with the Project will be subject to LCFS (Executive Order S-01-07), which requires a 10 percent or greater reduction in the average fuel carbon intensity by 2020 with a 2010 baseline for transportation fuels in California regulated by CARB. The program establishes a strong framework to promote the low carbon fuel adoption necessary to achieve the Governor’s 2030 and 2050 greenhouse gas goals.
	Cap-and-Trade Program	<p>Use of gasoline associated with the Project will be subject to the Cap-and- Trade Program.</p> <p>The rules came into effect on January 1, 2013, applying to large electric power plants and large industrial plants. In 2015, importers and distributors of fossil fuels were added to the Cap-and-Trade program in the second phase.</p> <p>Specifically, on January 1, 2015, cap-and-trade compliance obligations were phased in for suppliers of natural gas, reformulated gasoline blendstock for oxygenate blending (RBOB), distillate fuel oils, and liquefied petroleum gas that meet or exceed specified emissions thresholds. The threshold that triggers a cap-and-trade compliance obligation</p>



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		for a fuel supplier is 25,000 metric tons or more of CO ₂ e annually from the GHG emissions that would result from full combustion or oxidation of quantities of fuels (including natural gas, RBOB, distillate fuel oil, liquefied petroleum gas, and blended fuels that contain these fuels) imported and/or delivered to California.
Automotive Refrigerants	CARB Regulation for Small Containers of Automotive Refrigerant	Vehicles associated with the project will be subject to CARB's Regulation for Small Containers of Automotive Refrigerant. (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 5, Section 95360 et seq.) The regulation applies to the sale, use, and disposal of small containers of automotive refrigerant with a GWP greater than 150. The regulation achieves emission reductions through implementation of four requirements: 1) use of a self-sealing valve on the container, 2) improved labeling instructions, 3) a deposit and recycling program for small containers, and 4) an education program that emphasizes best practices for vehicle recharging. This regulation went into effect on January 1, 2010 with a one-year sell-through period for containers manufactured before January 1, 2010. The target recycle rate is initially set at 90%, and rises to 95% beginning January 1, 2012.
Light-Duty Vehicles	Assembly Bill 1493 (or the Pavley Standard)	Cars that drive to and from the Project will be subject to AB 1493, which directed the Air Resources Board (CARB) to adopt a regulation requiring the maximum feasible and cost-effective reduction of greenhouse gas (GHG) emissions from new passenger vehicles.



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		<p>Pursuant to AB 1493, CARB adopted regulations that establish a declining fleet average standard for carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and hydrofluorocarbons (air conditioner refrigerants) in new passenger vehicles and light-duty trucks beginning with the 2009 model year and phased-in through the 2016 model year. These standards are divided into those applicable to lighter and those applicable to heavier portions of the passenger vehicle fleet. The regulations will reduce “upstream” smog-forming emissions from refining, marketing, and distribution of fuel.</p>
	<p>Advanced Clean Car and Zero Emissions Vehicle (ZEV) Programs</p>	<p>Cars that drive to and from the Project will be subject to the Advanced Clean Car and Zero Emissions Vehicle Programs.</p> <p>In January 2012, the Air Resources Board approved a new emissions- control program for model years 2017 through 2025. The program combines the control of smog, soot and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards called Advanced Clean Cars. By 2025, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.</p> <p>The ZEV program will act as the focused technology of the Advanced Clean Cars program by requiring manufacturers to produce increasing numbers of ZEVs and plug-in hybrid electric vehicles in the 2018-2025 model years.</p>



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
	<p>Tire Inflation Regulation</p>	<p>Cars that drive to and from the Project will be subject to the CARB Tire Inflation Regulation, which took effect on September 1, 2010, and applies to vehicles with a gross vehicle weight rating (GVWR) of 10,000 pounds or less.</p> <p>Under this regulation, automotive service providers must, inter alia, check and inflate each vehicle’s tires to the recommended tire pressure rating, with air or nitrogen, as appropriate, at the time of performing any automotive maintenance or repair service, and to keep a copy of the service invoice for a minimum of three years, and make the vehicle service invoice available to the CARB, or its authorized representative upon request.</p>
	<p>EPA and NHTSA GHG and CAFE standards.</p>	<p>Mobile sources that travel to and from the project would be subject to EPA and NHTSA GHG and CAFE standards for passenger cars, light-duty trucks, and medium-duty passenger vehicles. ((75 FR 25324–25728 and 77 FR 62624–63200.)</p>
<p>Medium- and Heavy-Duty Vehicles</p>	<p>CARB In-Use On-Road Heavy-Duty Diesel Vehicles Regulation (Truck and Bus Regulation)</p>	<p>Any heavy-duty trucks associated with the Project will be subject to CARB standards.</p> <p>The regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet PM filter requirements. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent.</p> <p>The regulation applies to nearly all privately and federally owned diesel fueled trucks and</p>



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
	<p>CARB In-Use Off-Road Diesel Vehicle Regulation</p>	<p>buses and to privately and publicly owned school buses with a gross vehicle weight rating (GVWR) greater than 14,000 pounds.</p> <p>Any relevant vehicle or machine use associated with the Project will be subject to CARB standards.</p> <p>The CARB In-Use-Off-Road Diesel Vehicle Regulation applies to certain off-road diesel engines, vehicles, or equipment greater than 25 horsepower. The regulations: 1) imposes limits on idling, requires a written idling policy, and requires a disclosure when selling vehicles; 2) requires all vehicles to be reported to CARB (using the Diesel Off-Road Online Reporting System, DOORS) and labeled; 3) restricts the adding of older vehicles into fleets starting on January 1, 2014; and 4) requires fleets to reduce their emissions by retiring, replacing, or repowering older engines, or installing Verified Diesel Emission Control Strategies, VDECS (i.e., exhaust retrofits).</p> <p>The requirements and compliance dates of the Off-Road regulation vary by fleet size, as defined by the regulation.</p>
	<p>Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Regulation</p>	<p>Any relevant vehicle or machine use associated with the Project will be subject to CARB standards.</p> <p>The CARB Heavy-Duty Vehicle Greenhouse Gas Emission Reduction Regulation applies to heavy-duty tractors that pull 53-foot or longer box- type trailers. (California Code of Regulations, Title 17, Division 3, Chapter 1, Subchapter 10, Article 4, Subarticle 1, Section 95300 et seq.) Fuel efficiency is improved through improvements in tractor and trailer</p>



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		aerodynamics and the use of low rolling resistance tires.
	EPA and NHTSA GHG and CAFE standards.	Mobile sources that travel to and from the project would be subject to EPA and NHTSA GHG and CAFE standards for medium- and heavy-duty vehicles. (76 FR 57106–57513.)
Water Use		
Water Use Efficiency	Emergency State Water Board Regulations	<p>Water use associated with the Project will be subject to recent emergency regulations.</p> <p>On May 18, 2016, partially in response to Executive Order B-27-16, the State Water Board adopted emergency water use regulations (California Code of Regulations, title 23, section 864.5 and amended and re-adopted sections 863, 864, 865, and 866). The regulation directs the State Water Board, Department of Water Resources, and Public Utilities Commission to implement rates and pricing structures to incentivize water conservation, and calls upon water suppliers, homeowners’ associations, California businesses, landlords and tenants, and wholesale water agencies to take stronger conservation measures.</p>
	Executive Order B-37-16	<p>Water use associated with the Project will be subject to Emergency Executive Order B-37-16, issued May 9, 2016, which directs the State Water Resources Control Board to adjust emergency water conservation regulations through the end of January, 2017 to reflect differing water supply conditions across the state.</p> <p>The Water Board must also develop a proposal to achieve a mandatory reduction of potable urban water usage that builds off the</p>



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		<p>mandatory 25% reduction called for in Executive Order B-29-15. The Water Board and Department of Water Resources will develop new, permanent water use targets to which the Project will be subject.</p> <p>The Water Board will permanently prohibit water-wasting practices such as hosing off sidewalks, driveways, and other hardscapes; washing automobiles with hoses not equipped with a shut-off nozzle; using non- recirculated water in a fountain or other decorative water feature; watering lawns in a manner that causes runoff, or within 48 hours after measurable precipitation; and irrigating ornamental turf on public street medians.</p>
	Executive Order B-40-17	Executive Order B-40-17 lifted the drought emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne. It also rescinds Executive Order B-29-15, but expressly states that Executive Order B-37-16 remains in effect and directs that State Water Resources Control Board to continue development of permanent prohibitions on wasteful water use to which the Project will be subject.
	Senate Bill X7-7	<p>Water provided to the Project will be affected by Senate Bill X7-7's requirements for water suppliers.</p> <p>Senate Bill X7-7, or the Water Conservation Act of 2009, requires all water suppliers to increase water use efficiency. It also requires, among other things, that the Department of Water Resources, in consultation with other state agencies, develop a single standardized</p>



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
		water use reporting form, which would be used by both urban and agricultural water agencies.
	CalGreen.	The Project is subject to CalGreen’s water efficiency standards, including a required 20% mandatory reduction in indoor water use. (CalGreen, Division 4.3.)
	California Water Code, Division 6, Part 2.10, Sections 10910–10915.	Development and approval of the project requires the development of a project-specific Water Supply Assessment.
	Cap-and-Trade Program	Electricity usage associated with water and wastewater supply, treatment and distribution would be subject to the cap-and-trade program.
	California Renewable Portfolio Standards (RPS) (Senate Bill X1-2 and 350)	Electricity usage associated with water and wastewater supply, treatment and distribution associated with the Project will be required to comply with Renewable Portfolio Standards set by SB X1-2 and 350.
Water Recycling	Water Reclamation Requirements for Recycled Water Use. SWRCB Order WQ 2016-0068- DDW	<p>These requirements replace 2014-0090-DWQ General Waste Discharge Requirements for Recycled Water Use, and establish standard conditions for recycled water use and conditionally delegates authority to an Administrator to manage a Water Recycling Program and issue Water Recycling Permits to recycled water users.</p> <p>Only treated municipal wastewater for non-potable uses can be permitted, such as landscape irrigation, crop irrigation, dust control, industrial/commercial cooling, decorative fountains, etc. Potable reuse is not covered.</p>



Project Component	Applicable Laws/ Regulations	GHG Reduction Measures Required for Project
	Regulations for Groundwater Replenishment Using Recycled Water	This emergency rulemaking by the California Department of Public Health (California Title of Regulations, Title 22, Sections 60301.050 et seq.), effective June 18, 2014, applied to Groundwater Replenishment Reuse Projects (GRRPs) utilizing surface application, which received initial permits from the Regional Board. The regulations address permitting and plan approval, sampling requirements, operation requirements, and ongoing reporting requirements.
	Policy for Water Quality Control for Recycled Water. SWRCB Resolution No. 2009-, as amended by Resolution No. 2013-0003	The project would be subject to the State Water Resources Control Board statewide mandate to increase recycled water usage by 0.2 million acre- feet per year by 2020.

As described above, the project’s GHG emissions (both on and off-site) are regulated by scores of GHG emission reduction mandates. Compliance with these GHG reduction legal requirements is appropriately assumed to occur under CEQA. *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal. App. 4th 884, 906; *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal. App. 4th 214, 244-45. Thus, under this threshold, project GHG emissions are considered in the EIR to be less than significant impacts under CEQA.

The Newhall Court also recommended evaluating a project’s compliance with GHG reduction plans, and acknowledged that global climate change caused by greenhouse gas emissions was ultimately a cumulative impact. 62 Cal. 4th, at page 219. As the Governor’s Office of Planning and Research has noted:

Although climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment. CEQA authorizes reliance on previously approved plans and mitigation programs that have adequately analyzed and mitigated GHG emissions to a less than significant



level as a means to avoid or substantially reduce the cumulative impacts of a project.

(Technical Advisory, CEQA AND CLIMATE CHANGE: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review, Office of Planning and Research, June 19, 2008, at page 6. Available at: <https://www.opr.ca.gov/docs/june08-ceqa.pdf>.)

This EIR considers the project's compliance with the applicable GHG reduction plan for the region, the RTP/SCS adopted pursuant to SB 375, Stats. 2008, Ch. 728, by SCAG and approved by CARB in 2016. SB 375 was enacted after AB 32, and includes regional targets established by CARB for greenhouse gas reductions from the transportation and land use sectors that are not constrained by the GHG reduction mandates set forth in AB 32, and are estimated by CARB to result in additional GHG reductions from the land use and transportation sectors. Cal. Gov't Code § 65080(b)(2). The approved RTP/SCS designates the project site for future urbanized development, and the EIR describes the project's consistency with the RTP/SCS in Section 4.9, Land Use and Planning (page 4.9-33 through 4.9-36) and Section 4.6, Greenhouse Gas Emissions (pages 4.6-37 through 4.6-38). As the Project is consistent with the applicable RTP/SCS, under this threshold, project GHG emissions are considered in the EIR to be less than significant impacts under CEQA.

This EIR also considers the project's compliance with the applicable climate action plan, the City of Colton Climate Action Plan (CAP). The CAP is designed to support the State's overall GHG reduction goals for 2020 under AB 32. The Project's consistency with the CAP is demonstrated on page 4.6-33 through 4.6-36. Since the Project is consistent with CAP, it would not have a significant GHG emissions with implementation of MM 4.6-1.

At the State level, Executive Orders S-3-05 and B-30-15 are issued from the State's Executive Branch for the purpose of reducing greenhouse gas (GHG) emissions. The goal of Executive Order S-3-05 is to reduce GHG emissions to 1990 levels by 2020 was codified by the Legislature as the 2006 Global Warming Solutions Act (AB 32). As concluded in DEIR Subsection 4.6, *Greenhouse Gas Emissions*, the Project would be consistent with AB 32. Therefore, the Project does not conflict with this component of Executive Order S-3-05. The Executive Orders also established goals to reduce GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050. The goal of reducing GHG emissions to 40 percent below 1990 levels was codified in Senate Bill 32 (SB 32). According to research conducted by the Lawrence Berkeley National Laboratory and supported by the CARB, California, under its existing and proposed GHG reduction policies with which the Project would be required to comply, could achieve the 2030 goals under SB 32 (Lawrence Berkeley National Laboratory, *Modeling California Policy Impacts on Greenhouse Gas Emissions*, 2015). The goal of 80 percent below 1990 levels by 2050 has not been codified. However, studies have shown that in order to meet the 2030 and 2050 targets, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required (See, for example, Science, *The Technology Path to Deep Greenhouse Gas Emissions Cuts by 2050: The Pivotal Role of Electricity*, 2012). For example, in its Climate Change Scoping Plan, the California Air Resources Board (ARB) acknowledged that the "measures needed to meet the 2050 are too far in the future to



define in detail.” In the First Scoping Plan Update, however, ARB generally described the type of activities required to achieve the 2050 target: “energy demand reduction through efficiency and activity changes; largescale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately.”

Although the proposed Project’s emissions levels in 2030 and 2050 cannot be reliably quantified, due to the technological shifts required to attain such reductions and the unknown parameters of the regulatory framework in 2030 and 2050, statewide efforts are underway to facilitate the State’s achievement of that goal and it is reasonable to expect the Project’s emissions level to decline as the regulatory initiatives identified by ARB in the First Scoping Plan Update are implemented, and other technological innovations occur. Stated differently, the proposed Project’s total GHG emissions that are disclosed in the DEIR represents the maximum emissions inventory for the Project as California’s emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State’s environmental policy objectives. As such, given the reasonably anticipated decline in proposed Project emissions once it is fully constructed and operational, the proposed Project is consistent with the goals of the Executive Orders and SB 32.

The Scoping Plan recognizes that AB 32 establishes an emissions reduction trajectory that will allow California to achieve the more stringent 2050 target:

“These [greenhouse gas emission reduction] measures also put the state on a path to meet the long-term 2050 goal of reducing California’s greenhouse gas emissions to 80 percent below 1990 levels. This trajectory is consistent with the reductions that are needed globally to stabilize the climate.”

Also, ARB’s First Update “lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050,” and many of the emission reduction strategies recommended by ARB would serve to reduce the proposed Project’s post-2020 emissions level to the extent applicable by law. These emission reduction strategies recommended by ARB are as follows:

1. Energy Sector: Continued improvements in California’s appliance and building energy efficiency programs and initiatives, such as the State’s zero net energy building goals, would serve to reduce the proposed Project’s emissions level. Additionally, further additions to California’s renewable resource portfolio would favorably influence the proposed Project’s emissions level.
2. Transportation Sector: Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the proposed Project’s emissions level.
3. Water Sector: The proposed Project’s emissions level will be reduced as a result of further desired enhancements to water conservation technologies.



4. Waste Management Sector: Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the proposed Project's emissions level.

Furthermore, recent studies show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050. Even though these studies did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the State to meet the 2050 target⁵.

Given the proportional contribution of mobile source-related GHG emissions to the State's inventory, recent studies also show that relatively new trends, such as the increasing importance of web-based shopping, the emergence of different driving patterns by the "millennial" generation and the increasing effect of web-based applications on transportation choices, are beginning to substantially influence transportation choices and the energy used by transportation modes^{6,7,8}. These factors have changed the direction of transportation trends in recent years, and will require the creation of new models to effectively analyze future transportation patterns and the corresponding effect on GHG emissions. For the reasons described above, the proposed Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets.

Regarding goals for 2050 under Executive Order S-3-05, at this time it is not possible to quantify the emissions savings from future regulatory measures, as they have not yet been adopted; nevertheless, it can be anticipated that operation of the Project would comply with whatever measures are enacted that state lawmakers decide would lead to an 80-percent reduction below 1990 levels by 2050. Note again that the Project already includes several project design features that exceed regulatory requirements and reduce vehicle miles traveled.

Accordingly, taking into account the proposed Project's emissions, Project design features, standard measures and the progress being made by the State towards reducing emissions in key sectors such as transportation, industry, and electricity, the Project furthers the State's goals of reducing GHG

⁵ Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios. *Modeling California Impacts on Greenhouse Gas Emissions*. 3, 2015, Vol. 78, page 158-172.

⁶ Mineta Transportation Institute. *Synergistic Integration of Transportation Demand Management Strategies (Land Use, Transit, and Auto Pricing) with New Technologies and Services (Battery Electric Vehicles and Dynamic Ridesharing) to Enhance Reductions in VMT and GHG*. October 2015. Available at: <http://transweb.sjsu.edu/PDFs/research/1207-combining-transportation-demand-with-ridesharing-and-BEVs-to-reduce-GHG.pdf>.

⁷ American Public Transportation Association. *Shared Mobility and the Transformation of Public Transit*. March 2016. <https://www.apta.com/resources/reportsandpublications/Documents/APTA-Shared-Mobility.pdf>.

⁸ U.S. PIRG. *Millennials in Motion: Changing Travel Habits of Young Americans and the Implications for Public Policy*. October 2014. Available at: <https://uspig.org/sites/pirg/files/reports/Millennials%20in%20Motion%20USPIRG.pdf>



emissions to 1990 levels by 2020 and an 80-percent reduction below 1990 levels by 2050, and does not obstruct their attainment.

J-18:

This comment accurately states that Table 5-1 of the General Plan Noise Element describes land use compatibility for various community noise environments. The land use compatibilities stated in Table 5-1 of the General Plan are inclusive of transportation-related noise, and therefore the statement in the DEIR that the guidelines from Table 5-1 pertain to transportation-related noise is consistent with the General Plan Noise Element. Furthermore, both the Project-specific noise impact analysis (EIR *Technical Appendix K*) and DEIR Subsection 4.10, *Noise*, utilized the land use compatibility guidelines in the evaluation of exterior noise impacts. Accordingly, no revisions to the DEIR or the noise impact analysis (EIR *Technical Appendix K*) are necessary in response to this comment.

J-19:

The standards for adjacent mobile source noise sources set forth in Table 83-2 of San Bernardino County Development Code (SBCDC) Section 83.01.080(d) apply only to ambient operational mobile source noise and do not apply to noise generated by temporary construction activities. Indeed, as this comment states, SBCDC Section 83.01.080(g) specifically exempts the Project's construction noise levels that conform to that code section's specified permissible construction activity hours (i.e., 7:00 AM to 7:00 PM). The same code section also expressly exempts other temporary mobile sources, including emergency vehicles and emergency equipment. Temporary construction noise occurring during daytime hours and emergency vehicle noise are considered acceptable within urban and suburban environments and thus do not rise to the level of significant environmental impact. Although construction noise that occurs within the standards specified in SBCDC Section 83.01.080 (G) is regarded by the City as a less-than-significant impact, the DEIR conservatively provides additional analysis demonstrating that Project construction noise would comply with the construction noise level threshold of 85 dBA Leq for construction activities occurring near sensitive receptors over a period of eight hours or more adopted by the National Institute for Occupational Safety and Health (NIOSH) and thus would not result in harm to human health. The City has selected the 85 dBA Leq threshold in order to establish that the Project would not generate construction-related noise at levels that would harm human health. Accordingly, the DEIR has fully evaluated the Project's construction-related noise impacts and no further analysis is required. Furthermore, the comment suggests that because the Project's construction-related air emissions were evaluated as mobile sources of pollution in the Project's Air Quality Impact Analysis (EIR *Technical Appendix B*), the noise generated by the Project's construction activities should also be evaluated as mobile sources using the noise standards set forth in SBCDC Table 83-2 (Noise Standards for Stationary Noise Sources) and Table 83-3 (Noise Standards for Adjacent Mobile Noise Sources). However, the modeling software and the methodology used to calculate airborne emissions from construction equipment (refer to subsection 3.4 of the Project's Air Quality Impact Analysis [EIR *Technical Appendix B*]) are different than those that are used to calculate noise emissions from construction equipment (refer to subsection 3.5.1 of the Project's Noise Impact Analysis [EIR *Technical Appendix K*]). The DEIR relied on appropriate methodology in the evaluation of construction noise impacts and no revisions to the DEIR are required.



J-20:

Please see response to comment J-19 above. The comment inaccurately states that the City of Colton and the County of San Bernardino have established a maximum 6 dBA threshold of significance in residential areas to assess the significance of the Project's construction related noise levels. As explained in the Draft EIR at page 4.10-7, the City of Colton Municipal Code does not identify specific construction noise level standards or permitted hours of construction activities. Accordingly, the Draft EIR relies on the County of San Bernardino Development Code noise standards (i.e., SBCDC Section 83.10.080(G), which provides an exemption from the noise standards during construction activities that occur within the specified hours that are subject to the exemption. As the City's maximum interior and exterior noise thresholds would not be applicable during construction activities that comply with SBCDC Section 83.01.080 (G), the City has selected the 85 dBA Leq threshold in order to establish that the Project would not generate construction-related noise at levels that would harm human health.

J-21:

This comment suggests that worst-case scenario noise modeling would entail placement of noise-sensitive receivers at the property lines. However, in most cases, noise analysis at the property line conflicts with best practices and guidance provided by the Federal Highway Administration (FHWA)⁹, California Department of Transportation (Caltrans)¹⁰, and Federal Transit Administration (FTA)¹¹ for exterior noise analysis. Further, analysis at the property line can understate potential noise levels if a property-line barrier exists, or is planned, since it does not account for the shadow zone of the barrier itself. The information provided below provides further clarification as to why receiver placement at the property line is inappropriate for the analysis of noise levels at the receiver.

The receiver locations used in the Noise Impact Analysis (EIR *Technical Appendix K*) were chosen to represent outdoor areas of frequent human use as defined by the Federal Highway Administration's (FHWA) Analysis and Abatement Guidance for noise studies. The FHWA guidance is outlined as it relates to highway traffic noise analysis, however, it also provides the best practices for the selection of sensitive, outdoor receiver locations in relation to any noise source (e.g., mobile or stationary). Further, FHWA guidance is consistent with the FTA Transit Noise and Vibration Impact Assessment guidance on the selection of noise-sensitive receiver locations. FHWA guidance identifies acceptable locations for exterior receivers and the Noise Impact Analysis (EIR *Technical Appendix K*) was prepared consistent with receivers located at an area between the right-of-way line and a building where frequent human activity occurs such as a patio, pool, or play area in the yard of a home.

Further, due to existing noise barriers and topography in the Project study area (which includes steep ridgelines to the north and east), it is not possible to accurately describe the noise levels at the receiver

⁹ U.S. Department of Transportation, Federal Highway Administration, Office of Environment and Planning, Noise and Air Quality Branch. 1995. *Highway Traffic Noise Analysis and Abatement Policy and Guidance*. June 1995.

¹⁰ California Department of Transportation Environmental Program. 2013. *Technical Noise Supplement – A Technical Supplement to the Traffic Noise Analysis Protocol*. September 2013.

¹¹ U.S. Department of Transportation, Federal Transit Administration. 2006. *Transit Noise and Vibration Impact Assessment*. May 2006.



locations with barrier attenuation if analyzed at the property line. Instead, all noise levels are analyzed at least 10 feet from walls or reflective surfaces per Caltrans Technical Noise Supplement guidance¹⁰. If receiver locations were placed at the property line, or immediately adjacent to the barriers at the property line as the comment suggests, this would understate potential noise levels given the extra benefits from a noise barrier as indicated by the FHWA Analysis and Abatement Guidance when receivers are located within Shadow Zones (i.e., the closer to the barrier, the greater the barrier attenuation). Therefore, consistent with FWHFA guidance, Caltrans guidance, and FTA guidance, no revisions have been made to the noise-sensitive receiver locations or analysis in the Noise Impact Analysis. This comment also does not warrant any revisions to the DEIR.

J-22:

As discussed in the Noise Impact Analysis (EIR *Technical Appendix K*), receiver location R5 is located at the Maryknoll Terrace Apartments (p. 57 of EIR *Technical Appendix K*). Additionally, receiver location R3 is located near homes on Lomita Lane, which represents closer, worst-case noise levels than those that would be experienced at homes located at greater distances on Coyote Drive. Lastly, the construction noise level analysis at R7 and R8 (and all receiver locations) assumes the worst-case construction activities at the point on the Project site closest to each receiver location and does not, as comment J-22 suggests, adjust the activities based on the underlying land use type (i.e., open space or residential, etc.). This is a conservative approach which likely overstates the construction noise levels at all receiver locations. No ‘green space buffers’ are accounted for in the analysis, since the distances shown on Exhibit 11-A of the Noise Impact Analysis represent the distances used in the analysis from the receiver locations to the edge of the Project’s construction activity.

Other sensitive land uses in the Project study area that are located at greater distances than those identified in the Noise Impact Analysis would experience lower noise levels than those presented in the Noise Impact Analysis due to the additional attenuation from distance and the shielding of intervening structures. Based on recommendations of the FTA, it is not necessary to identify receiver locations at each individual building or residence, because each receiver represents a group of buildings that share acoustical equivalence. In other words, the area represented by the receiver shares similar shielding, terrain, and geometric relationship to the reference noise source. Receivers represent a location of noise sensitive areas and are used to estimate the future noise level impacts.

Based on the foregoing, this comment does not warrant revisions to the Project’s Noise Impact Analysis or the DEIR.

J-23:

All components of Mitigation Measure MM 4.10-1 that require notes to be added to the grading plan(s) are enforceable through the City’s ordinary protocol for enforcement of components of the grading permit. Upon the City’s approval of the grading plan(s), all grading plan notes become a part of the requirements associated with the grading permit approval. Noncompliance with the approved grading plan notes may result in the City’s revocation of their approval of the grading permit. In response to this comment, Mitigation Measure MM 4.10-1 has been revised in the Final EIR to better ensure



enforcement. Mitigation Measure MM 4.10-1 as revised specifically requires Project contractors to ensure compliance with the notes listed on the grading plans, and further stipulates that contractors must permit inspection of the construction site by City of Colton staff or its designees to confirm compliance. The required mitigation also specifically requires that the grading plan notes be specified in bid documents issued to prospective construction contractors. Any construction contractor that does not abide by the notes on the grading plan would be in breach of contract, which represents a strong disincentive to violate the identified requirements. Additionally, because the City of Colton or its designees must be permitted to monitor these requirements, any identified violation of the grading plan notes could potentially result in a stop-work order on construction activities at the site, or revocation of the grading permit, which also represents a strong disincentive to violate the requirements. Mitigation measures are not required under CEQA to specifically include provisions for a reporting system, documentation logs, or any other specific methods of oversight as suggested by the commenter. The City of Colton finds that the implementation of Mitigation Measure 4.10-1 as revised in the Final EIR can be adequately assured and enforced.

J-24:

The version of Figure 4.10-2, *Construction Activity Locations*, included in the DEIR provides sufficient information for the grading contractor to determine appropriate staging area locations to comply with the 100-foot setback from sensitive receptors required by Mitigation Measure MM 4.10-1(C). Large areas of the Project site are located more than 100 feet from sensitive receptors, and the restriction to not locate within 100 feet of sensitive receptors is sufficiently clear and instructional. No revisions to the DEIR are required.

J-25:

For clarification purposes, a larger version of the inset graphic associated with Figure 4.10-3, *Operational Noise Sources*, has been included herein as an attachment to the Final EIR. This comment does not warrant revisions to the Project's Noise Impact Analysis or to the text of the DEIR. The provision of a larger version of this graphic is a restatement of information provided in the Project's administrative record on file with the City of Colton and does not constitute new information or change the DEIR's significance conclusions.

J-26:

The DEIR discloses that in the event that the Colton Fire Department (CFD) decides not to develop Planning Area 13 with a fire station site, there would be inadequate fire protection services available to serve the future demand of the Project in accordance with the CFD's performance standards. As stated on page 4.12-6 of the DEIR, because it is unknown what site (if any) may be selected as a potential future development or expansion of a CFD facility, it would be highly speculative for the DEIR to evaluate the potential for physical environmental impacts that could result from development of a CFD facility by the CFD on an unspecified alternative site. Additionally, the potential future development of a new or expanded CFD facility would require subsequent discretionary actions by the City of Colton, which would require review under CEQA. For the reasons stated above, the DEIR did include analysis that contemplated a scenario in which an on-site fire station is not constructed, and



disclosed the physical environmental impacts that would be known to occur under that scenario based on all available information at the time the DEIR was prepared.

J-27:

The air quality impact analysis (EIR *Technical Appendix B*) assumed Planning Areas 12 and 13 would be developed with medium density residential land uses because compared to the alternate development of Planning Area 13 with a fire station site, the residential land use alternative represents the worst-case scenario with regard to air quality impacts due to its substantially higher vehicle trip generation. Although the specific details regarding the size and staffing of a fire station within Planning Area 13 would not be determined until the Colton Fire Department (CFD) elects to construct a fire station, it is assumed for purposes of this discussion that the fire station would require the same level of staffing as the nearest fire station (Colton Fire Station #3) located at 1100 S. La Cadena Drive. Colton Fire Station #3 is staffed with three staff members (one captain, one engineer, and one firefighter medic). Based on the most recently available trip generation rates (10th Edition) published by the Institute of Transportation Engineers (ITE), a fire station (based on ITE land use code 575 Fire and Rescue Station) would generate 0.44 PM peak hour trips per employee resulting in the generation of approximately 2 PM peak hour trips (0.44 x 3 employees) which is less than the 11 PM peak hour trips that would be generated by PA 13 with the development of residential uses. As the use of this methodology is clearly stated in Subsection 4.2, *Air Quality*, no revisions to the DEIR are necessary to respond to this comment. No revisions to the DEIR are necessary to respond to this comment.

J-28:

The air quality impact analysis (EIR *Technical Appendix B*) assumed Planning Area 12 would be developed with medium density residential land uses because compared to the alternate development of Planning Area 12 with an elementary school site, the residential land use alternative represents the worst-case scenario with regard to air quality impacts due to its substantially higher vehicle trip generation. As the use of this methodology is clearly stated in Subsection 4.2, *Air Quality*, no revisions to the DEIR are necessary to respond to this comment. Furthermore, in order to fully disclose the methodology used to determine that residential use of Planning Area 12 represents the worst-scenario for the purposes of the environmental evaluation in the DEIR, a trip generation summary table has been included as Attachment D to this FEIR, which shows the trip generation associated with a scenario in which Planning Area 12 is developed with an elementary school site. As demonstrated in Attachment D, the scenario in which Planning Area 12 would be developed with an elementary school would generate a total of 9,461 daily vehicle trips. DEIR Subsection 4.14.5 disclosed that the scenario in which Planning Area 12 would be developed with residential land uses (the scenario analyzed throughout the DEIR) would generate a total of 10,021 daily vehicle trips. Accordingly, the development of Planning Area 12 with medium density residential land uses would generate 560 more daily vehicle trips when compared to the alternate elementary school land use scenario, and therefore represents the worst-case scenario with respect to air quality, greenhouse gas emissions, noise, and traffic-related impacts.



J-29:

The City has responded to all of GSESJA's comments above. The commenter has not introduced substantial evidence that would lead to a conclusion that the is flawed or otherwise requires amendment requiring a recirculation of the DEIR under CEQA Guidelines §15088.5. The City acknowledges the commenter's request to receive any subsequent environmental documents, notices, public hearings, and notices of determination for this Project, and will contact the commenter at the contact information provided in this comment for any future communications.



LETTER K (Page 1 of 2)



September 21, 2017

City of Colton
Mario Suarez – msuarez@coltonca.gov

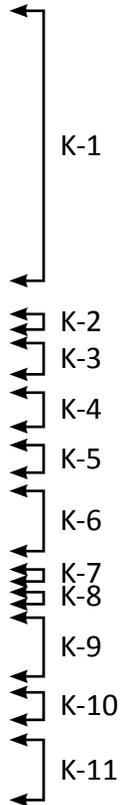
RE: Roque Ranch EIR Comments and Questions on behalf of Cadena Creek Mobilehome Park

Mario Suarez:

I am the President of Mobile Community Management Co., the authorized agent for Cadena Creek Mobilehome Park, located at 2851 S. la Cadena Drive in the city of Colton. This letter is a follow up to your meeting on September 19, 2017 with our Regional Manager, Laura Slobojan, and Nick Ferrari, Assistant State facilities Manager, regarding the proposed Roque Ranch development. Thank you for agreeing to meet with them about our questions and we appreciate the opportunity to follow up with you in writing.

As you know, our property (the mobilehome park) is situated such that it will abut the Roque Ranch Project. Additionally, the Cadena Creek, a primary water channel, runs directly through our property. We are trying to clarify some of our concerns after our review of the Draft EIR. Our questions are:

1. The plan calls for the lift station currently situated on our property to be abandoned.
 - a) What will this process entail and who is responsible for the abandonment and removal of the lift station including equipment and materials from the site?
 - b) What is the expected impact of the removal of the lift station on the resident of our property?
 - c) What will be installed upon the vacated area once the lift station is removed/abandoned?
2. The EIR describes the collection of storm water by a system of interceptor drains and storm drains that convey to numerous water basin throughout the Roque Ranch Project.
 - a. Who will own and operate the water basins?
 - b. How will water be released from the basins and how is the drainage controlled?
 - c. What will cause water to be released from basins into Cadena Creek, which runs through our property, and how are drainage patterns specifically addressed as to mitigate overflow into and of Cadena Creek?
 - d. What measures will be taken to mitigate the water flows from the box culvert into Cadena Creek?
 - e. What plans does the Roque Ranch Project include to prevent erosion of Cadena Creek, including its banks, depth, transition points, sediment deposits and overall structure?

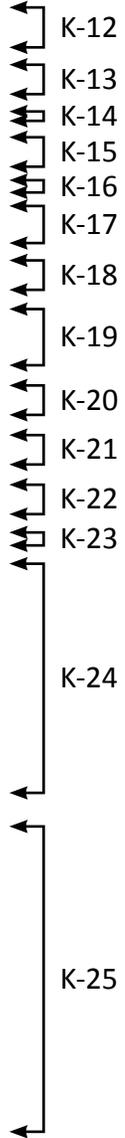




LETTER K (Page 2 of 2)

Cadena Creek Mobilehome Park
EIR Draft – Page 2 of 2

3. It is our understanding that the proposed Fire Station, PA 13, has not been formally approved by the Fire Department, and we do have the following questions:
 - a. Where is the proposed entrance to parcel P13 and will there be any egress from or onto our property?
 - b. Is there an alternative use planned and if so, what is that use?
 - c. Our property has a "billboard sign" near this parcel – will the "billboard sign be affected by proposed plan? If so, what is that affect?
 - d. When is parcel PA 13 expected to be improved?
4. PA 13 is also below the existing grade of the La Cadena Road and the Park entrance road.
 - a. What is proposed and approved grade of parcel PA13, PA 8 and PA9 (medium density housing)?
 - b. The review of Section U-U of the Project plans shows our property line and the 2 to 1 grade of the parcel PA 9 and shows an interceptor drain. What is the size and length of the drain and who is responsible for maintaining this drain?
5. The EIR Draft includes an Emergency Access Road is located on the westerly side of our property.
 - a. What material will this be comprised of and who will be responsible to maintain this road?
 - b. What type of fencing will be used and will gates be installed? If so, will the gates be locked and who will have keys to the gate?
 - c. Who will be responsible for the maintenance of the fence (and gate(s))?
6. The EIR Draft includes language regarding the Cadena Creek as a component of the storm water runoff and natural drainage flow of the area and relevant drainage system. As the Cadena Creek is not fully maintained by the regional agencies we are unclear as to how additional water directed into the Cadena Creek will be addressed.
 - a. How will the additional water flowing into the Cadena Creek, because of the development of the Roque Ranch Project, be addressed and what measures will be taken to ensure the stability, structural integrity and operation of the Cadena Creek will not be compromised including, but not limited to: the overflowing of the Creek onto the property, the erosion of its banks and structure, the additional deposits of sediment and debris, its depth and its flow?



Thank you in advance for your time in this matter. Please feel free to contact me by email at natalie.costaglio@mcmcn.net or by telephone at 714-480-1120, ext. 103.

Sincerely,

Natalie Costaglio

cc: Laura Slobojan, Regional Manager
Nick Ferrari, Assistant State Facilities Manager
Park Drawer

1801 E. Edinger Avenue Suite 230 Santa Ana, CA 92705



Mobile Community Management Co. – Comment Letter K

K-1:

The City acknowledges that the Cadena Creek Mobile Home Park (referred to as “mobile home park” hereafter) abuts the southern boundary of the Project site, and also acknowledges the commenter’s declared status as an authorized agent of the Cadena Creek Mobile Home Park. Additionally, the City acknowledges that Cadena Creek runs through the mobile home park and the southern portion of the Project site. The subsequent comments provided by the commenter do not directly address the adequacy of the analysis in the DEIR and were primarily directed to the City in the form of a series of questions asking for clarification regarding specific Project components. To the extent possible based on information that is available, the responses below provide information to clarify the Project components regarding the proposed Project in an effort to address the commenter’s concerns. Although the responses to this comment letter include clarification regarding specific Project components for informational purposes, the Project Description that was provided in Section 3.0 of the DEIR represents an adequate description of the proposed Project and no revisions to the DEIR are necessary based on the comments provided by the commenter.

K-2:

The existing sewer lift station would be abandoned once the new sewer lift station has been constructed and put into service.

K-3:

The abandonment of the existing sewer lift station would be implemented by the Project Applicant/construction contractor with oversight by the City of Colton Water and Wastewater Department.

K-4:

In order to abandon the existing sewer lift station, new gravity sewer pipelines would be installed to convey the sewer flows westerly to facilities in Orange Street and Center Street and subsequently to the site of the proposed sewer lift station. Please refer to Figure 3-7, *Proposed Conceptual Sewer Plan*, of the DEIR for a depiction of the conceptual sewer plan that is proposed. During construction of the proposed gravity sewer pipelines, there may be temporary limited roadway access within the mobile home park community. Sewer services to the mobile home park would be uninterrupted during construction of the new sewer lift station and gravity sewer pipelines.

K-5:

Once removed, the sewer lift station property would be re-graded and landscaped to match the surrounding area.



K-6:

The City acknowledges that the DEIR describes the proposed storm water collection system. A comprehensive storm drain system would be installed throughout the Roquet Ranch development to control storm water runoff.

K-7:

The Roquet Ranch homeowner's association would own and maintain the proposed storm water basins.

K-8:

The proposed basins have been designed in accordance with the City of Colton standards to detain and slowly release storm water to allow particles and associated pollutants to settle out. The water quality basins would function by allowing the storm water runoff to settle into the basin pond and subsequently infiltrate through engineered soil media into an underground sub-drain system which would connect to the downstream storm drain system. Detention basins would function via a basin outlet structure that would restrict the peak storm water runoff to levels below the pre-development peak runoff and would detain the increased storm water volume within the detention basin pond.

K-9:

There would be no change to the existing drainage pattern of the segment of Cadena Creek that runs through the Mobile Home Park. The Project's proposed storm drain system would discharge storm water into Cadena Creek via the system of storm drains and channels depicted on Figure 4.8-3, *Conceptual Drainage Plan*, of the DEIR. As described on pages 4.8-13 through 4.8-16 under Threshold d of Subsection 4.8.4 of the DEIR, the Project would result in an increase in the 100-year storm peak discharge (Q_{100}) from the South subarea (tributary to Cadena Creek and the Highgrove Channel). However, as noted on page 4.8-13 of the DEIR, the time of concentration for the peak flows to reach the portion of Cadena Creek adjacent to the Project site from the upstream portions of the watershed would be approximately 60 minutes, whereas peak flows from the Roquet Ranch Project tributary to Cadena Creek would have a time of concentration of approximately 20 minutes. As discussed on page 4.8-13 of the DEIR, because the peak flows would reach Cadena Creek prior to the arrival of peak flows from upstream portions of the Cadena Creek watershed, the proposed Project would not substantially increase the rate or amount of surface runoff that is discharged to Cadena Creek, and the Project would not result in flooding hazards that could affect the Mobile Home Park or any other downstream properties.

K-10:

As described in the response to comment K-9 above, the Project would attenuate flows and would not result in flooding hazards affecting the Mobile Home Park or any other downstream properties. A box culvert drainage structure is proposed to convey storm water from La Cadena Drive through the Project site to the mobile home park. It would include an outlet velocity reducer, such as rock riprap, to mitigate water velocities prior to outletting into Cadena Creek at the mobile home park.



K-11:

There are no plans to improve the off-site portions of Cadena Creek. As described in responses K-8, K-9, and K-10 above, the Project would implement a system of storm drains, flood control channels, water quality basins, and detention basins (as depicted on Figure 4.8-3, *Conceptual Drainage Plan*, of the DEIR) that would capture, treat, and reduce velocities of storm water prior to storm water discharging from the Project site. With implementation of these measures, the Project would not result in substantial erosion hazards to Cadena Creek, either on site or within the portion that traverses the Mobile Home Park. No revisions to the DEIR are warranted with respect to this comment.

K-12:

The commenter is accurate in stating that at the time this EIR was prepared (and at the time this Final EIR was prepared), the Colton Fire Department had not reached a decision as to whether Planning Area 13 would be developed with a fire station facility.

K-13:

According to the Roquet Ranch Specific Plan, vehicular access to Planning Area 13 would be provided from Planning Area 9 via an access road extending from La Cadena Drive, and direct access from Planning Area 13 to the Mobile Home Park is not proposed (T&B Planning, Inc., 2017, p. III-46).

K-14:

As noted in Table 3-1, *Specific Plan Land Use Summary*, on page 3-9 of Section 3.0, *Project Description*, of the DEIR, the alternative land use planned for Planning Area 13 is Medium Density Residential (MDR), which would result in the development of up to 11 dwelling units.

K-15:

DEIR Figure 3-11, *Proposed Physical Disturbances*, overstates the limits of the Project's off-site physical disturbances to the south of Planning Areas 9 and 13. As depicted on DEIR Figure 3-9, *Conceptual Grading Plan*, the Project's grading impacts would not extend off-site to the south of Planning Areas 9 and 13 as DEIR Figure 3-11 indicates. Accordingly, the existing billboard to the south of Project site would not be impacted by the Project. The version of Figure 3-11, *Proposed Physical Disturbances*, included in the DEIR resulted in an overly conservative impact analysis, and as such, no revisions to the DEIR are necessary in response to this comment.

K-16:

As described in Section II of the Roquet Ranch Specific Plan and Subsection 3.4.1 (C) of the DEIR, development of a fire station (or the alternative land use of MDR) in Planning Area 13 would occur as part of Phase I of the Project, with construction activities commencing in 2017.

K-17:

The City acknowledges that, under existing conditions, the area of the Project site where Planning Area 13 is proposed is located at a lower elevation than La Cadena Road (abuts Planning Area 13 to the east) and the mobile home park entry roadway.



K-18:

The proposed grade elevation for Planning Areas 8, 9, and 13 would be approximately 900 feet above mean sea level (amsl).

K-19:

The interceptor drain located adjacent to the mobile home park's entry road would be owned and maintained by the Roquet Ranch homeowner's association. The precise size and length of this facility would be determined as part of future grading and improvement plans and would be sized in accordance with the applicable San Bernardino County Flood Control District requirements.

K-20:

The City acknowledges that an emergency access road is proposed on the southern portion of the Project site to the west of the mobile home park.

K-21:

The emergency access road would be a typical asphalt concrete paved roadway. The portion of the emergency access road that would be located within Roquet Ranch would be owned and maintained by the City of Colton. The portion of the emergency access road that would be located on the mobile home park property would be owned and maintained by the mobile home park.

K-22:

It is unknown at the time of the preparation of this Final EIR type of fencing and gate(s) would be installed at the intersection of the proposed emergency access road and the mobile home park. The fencing would be constructed in accordance with Chapter 15.24 of the City of Colton Municipal Code, which mandates the use of masonry, cement, ornamental iron, or similar types of materials. It is anticipated that the gates would remain locked and that the Colton police department and Colton fire department would possess keys to the gates.

K-23:

At the time of the preparation of this Final EIR, it is anticipated that the Project's homeowner's association would be responsible for maintenance of the fencing and gate(s) that would be installed at the intersection of the proposed emergency access road and the mobile home park.

K-24:

Please see response to comment K-9. As described in Threshold d of Subsection 4.8.4 of the DEIR, the Project would result in an increase in the 100-year storm peak discharge (Q_{100}) from the South subarea (tributary to Cadena Creek and the Highgrove Channel). However, the time of concentration for the peak flows to reach the portion of Cadena Creek adjacent to the Project site from the upstream portions of the watershed would be approximately 60 minutes, whereas peak flows from the Roquet Ranch Project tributary to Cadena Creek would have a time of concentration of approximately 20 minutes. Because the peak flows would reach Cadena Creek prior to the arrival of peak flows from



upstream portions of the Cadena Creek watershed, the proposed Project would not substantially increase the rate or amount of surface runoff that is discharged to Cadena Creek in a manner that would result in flooding affecting the Mobile Home Park or any other downstream properties.

K-25:

The City recognizes the concerns that are expressed in commenter's letter and acknowledges the contact information.



LETTER L (Page 2 of 8)

As all these factors have bearing on Quality of Life issues, these findings alone should be enough to deny approval for the project. However, the law allows city officials to dismiss any or all of them, and thus the EIR seems more like a charade than a means of protecting us and the places that give meaning to our lives as it was intended to be.

←
L-4
←

On all other issues the EIR finds the potential harmful effects can be mitigated to achieve the desired level of compliance with environmental standards. Many of the mitigations, however, are based on unrealistic assumptions and faulty data about the effects of a project this size on the immediate area of La Loma Hills and the areas just beyond. These assumptions include the faulty projections of increased population and vehicle trips. Thus, the conclusions are not reliable.

←
L-5
←

For example, the EIR finds that building a thousand homes for more than three thousand people and their several thousand cars on La Loma Hills would cause "no significant effect" to scenic vistas, wildlife habitat, historic resources, light and noise levels, public services, and so forth.

←
L-6
←

A comparison of the layout to the actual views of the hills makes clear that most of the dwellings will be visible for miles around, that 336.2 acres of natural habitat will be forever eliminated or compromised, that ancient artifacts and historical sites will of necessity be destroyed or threatened, that the night sky will be lit with streetlamps and houselights, that lawn-mowers and leaf-blowers and boom-boxes and motors and engines and illegal fireworks and chain-saws and street-sweepers and street repairs and other nuisances of modern life will add to the background roar of the freeway, that demand on local public services will necessarily lead to increases in taxes and fees, and so forth.

←
L-7
←

There is nothing logical or reasonable about the EIR'S finding that because La Loma Hills has not been designated as a "scenic vista" within the City of Colton nobody's view will be marred by the new streets and hundreds of homes on its east, south and west sides where now we see beautiful rugged slopes, rolling meadows and twisting layers of geological history.

←
L-8
←

This absurd conclusion denies a fact of great significance to our communities. These hills have long been a beloved scenic landmark to many thousands of people who live in the heart of the Santa Ana River Watershed, and they are no less so for lack of a designation by a governing authority.

←

However, we did find some aspects of the EIR to be helpful, as it does admit to certain considerations that we believe should be given priority over all others: the ecological integrity of the hills, the well-being of the surrounding communities, and the heritage of the people who live here.

←
L-9
←

First, La Loma Hills is a distinctive natural feature that has served human and animal populations in many capacities down through the ages, and still does in our own time precisely because they are still undeveloped. Second, the communities which sprang up around these hills over the millennia have always benefitted, and still do, from their proximity to a charming unspoiled

←
L-10 Cont.
←



LETTER L (Page 3 of 8)

landmark. Third, the history of the many peoples who came here revolves around these hills, and therefore La Loma Hills is central to our local heritage.

↑ L-10 Cont.
←

The EIR provides a detailed report on 25 known archeological sites on La Loma Hills, a mixed blessing in that this revelation is of great value to all of us, but it also means that the artifacts are now in danger of being defaced or destroyed by vandals and vagrants. If the project is approved, the danger will be increased.

Yet, the EIR does not grasp the significance of these artifacts or their location, for both are dismissed as inconsequential. There is every reason to believe these hills were considered sacred by the native peoples who came here--including the People of the West, People of the Highlands, People of the Pines and Speakers of the Language whom we know as Tongva, Serrano, Luiseno and Cahuilla.

Some of the artifacts appear to be fertility symbols, and there used to be hot springs in the flood plain to the south of the hills. La Loma Hills marks the territorial borders of these often-warring native peoples, and they used to come here for the waters. They believed the Creator had given them the hot springs to mark the area as a place of peace, a blessing. That means that both the hills and the flood plain below them were considered sacred. Their legacy is part of our community heritage.

If we don't place value on our community treasures, who will? Elsewhere, in places like Stonehenge, mysterious ancient artifacts are protected and cherished as cultural assets, and people come from all over the world to see them.

These hills play a featured role in the history of human settlement in the Santa Ana River Watershed which runs from the top of the San Bernardino Mountains to the Pacific Ocean. La Loma Hills is located in the heart of this watershed, slightly north of the less well-known Springbrook Arroyo Watershed which runs from the escarpment that bifurcates Pigeon Pass to the Santa Ana River.

L-11 Cont.
↓

The Initial Study of this CEQA Report correctly states that settlement in our immediate area goes back several thousand years; itemizes two dozen native archeological sites of indeterminate age on La Loma Hills alone; mentions the Spanish Mission and Mexican periods, the Mormon Colony at San Bernardino, the Lugos, the founding of Colton, something called "the Trujillo Ditch", Arthur Roquet and his ranch, and other related topics.

All these rightfully belong in the document. But there is so much more that was left out that should have been included. It is shocking that professional researchers could have failed to discover any of these pertinent facts of history that illuminate the landscape and its secrets.

The study should have told us why the Trujillo Ditch is cited twice, why "The Agua Mansa Story" by Bruce Harley (*San Bernardino County Museum, 1991*) is listed in the bibliography, and how it is that Pellissier Ranch came to be.

The question must be asked why it is that the Cultural Study is so seriously deficient when any one of these topics could have lead to further discoveries of other stories of compelling



LETTER L (Page 4 of 8)

significance to the history of La Loma Hills, for the local libraries, museums and bookstores together form a fairly comprehensive archive for research. These discoveries would include:

- Santa Ana River Watershed
- Cajon Pass
- Mission San Gabriel
- Old Mission Road
- Town of San Bernardino
- San Bernardino Estancia
- Old Spanish Trail
- Horse Thief Canyon
- Reche Canyon
- Pigeon Pass
- Springbrook Arroyo
- Old Spanish Trail
- Chief Wakara
- Politana
- Rowland-Workman Party
- Lorenzo Trujillo
- Juan Antonio
- Juan Bandini
- Jurupa Rancho
- Lorenzo Trujillo
- Parish of San Salvador
- Battle of Pigeon Pass
- Agua Mansa
- La Placita de los Trujillos
- La Loma School
- Church of San Salvador
- Bell of San Salvador
- Township of San Salvador
- Agua Mansa Cemetery
- Flood of 1862
- Trujillo Family Adobe
- Trujillo School
- Trujillo Cantina
- Antoine Pellissier
- Pellissier Ranch
- Trujillo Water Company
- The Grange

All of these and more should have been included in the Cultural Studies because La Loma Hills played a significant role in their histories. Here follows a brief account of the part of that history that has bearing on the decision about the Roquet Ranch Project:

L-11 Cont.



LETTER L (Page 5 of 8)

In Spanish California days, Mission San Gabriel rancho holdings stretched from the Pacific Ocean to the Coachella Valley, encompassing territory from at least two native tribes. After Mexican Independence the mission-system was broken up and their vast holdings were distributed in the form of government grants by agents from the new government to gentlemen who qualified for the privilege.

One of the grantees, a Peruvian-born son of Italian immigrants named Juan Bandini, obtained a modest portion of Mission San Gabriel's holdings in 1838 which he called "Jurupa Rancho". It was a fine place to graze his livestock, and there was a road for mule-trains that ran through his property along the west side of the Santa Ana River from the San Bernardino Estancia to Mission San Gabriel. Except for the outlaws who came by to raid his ranch on nights of the full moon, his was a good situation.

In 1842, a group of about one hundred men, women and children lead by Lorenzo Trujillo walked more than a thousand miles on a trade-route that later became known as the "Old Spanish Trail" from Abiquiu, New Mexico, to San Bernardino Valley in Alta California. They were offspring of Pueblos, Comanches and other native tribesmen captured by enemy warriors and sold into slavery. Their own offspring were raised as *Genizaros* by the patron act as peacekeepers. They were expecting to go to work for Jose del Carmen Lugo, owner of a huge estate in what is now San Bernardino. Their assignment was to rid the place of vicious cut-throats who made a living stealing cattle and horses from the ranches.

But, the deal fell through. However, as it happened, they ended up with an offer from Bandini to protect Rancho Jurupa in exchange for a section of his land. La Loma Hills was a landmark feature of the Bandini Donation. The pioneers established two villages, one on either side of the river: Agua Mansa on the western side along the river and La Placita de los Trujillos on the eastern side nestled against the rugged hills.

Besides serving as a land-grant boundary and picturesque backdrop for everyone who came through Agua Mansa from Cajon Pass, these hills were handy as a lookout for Lorenzo's sons who had the job of keeping the peace. Even at lower elevations and on a moonlit night, they had a clear view from the hills across the valley to a place below the pass just ten miles away as the crow flies. It is probably one of the things that gave them the advantage in the historic Battle of Pigeon Pass (1845).

La Loma Hills was also a refuge in times of emergencies. During the famous Flood of 1862, when Agua Mansans fled to the bluffs above the old mission road that connected their village to the Old Spanish Trail, Placitanos escaped to the hills behind their homes.

Not one life was lost on either side of the river, for the padre was on watch that night. He heard the roar of the floodwaters heading their way, and rang the bell that stood in the yard of the Church of San Salvador in time for everyone to get out of harm's way. Agua Mansa and La Placita were washed away, including the Trujillo family homestead. But the people of San Salvador rebuilt their villages on higher ground. After that, they farmed the bottom-land and grazed their livestock on the tablelands and hillside meadows. Many of their descendants still live in the neighborhoods around La Loma Hills.

L-11 Cont.



LETTER L (Page 6 of 8)

In 1905 Antoine Pellissier acquired 500 acres of what was once La Placita. He established his ranch on the foundations of both the original and the second village squares which can be presumed to be covered with a foot of soil. His dairy and winery were successful enterprises through the 1960s, the neighborhood around La Loma Hills is still home to some of his descendant, also.

The people of La Placita, Agua Mansa, Colton, Highgrove, Riverside and Grand Terrace were not discrete societies unto themselves. They lived side by side and their histories are intertwined with one another. We cannot understand who we are and where we live if we do not realize this most important fact of our local heritage.

In 1912 Northside residents established Riverside's first neighborhood association for the purpose of protecting their rural agricultural lifestyle and bringing certain amenities to their community. They are one of the reasons for the stability of the neighborhood, and they are committed to passing the heritage of La Placita on to the generations to come.

In 1990, when the undeveloped rural agricultural properties adjacent to single-family residential parcels on both sides of the county line were rezoned as Industrial-BMP and commercial, the integrity of the old neighborhoods around La Loma Hills in Colton and Riverside was compromised. This is one of the reasons residents from both jurisdictions asked for a neighborhood Specific Plan.

We are not integers in a matrix of statistics. We are individual human beings. Some of us have ancestors who built the old communities, whose names are familiar to this day. And they have left us an inheritance, a heritage peculiar to this particular place on the map.

Joyce Carter Vickery gave us a clue in her ground-breaking book "Defending Eden: New Mexican Pioneers in Southern California 1830-1890" (UCR History Department and Riverside Museum Press, 1977). It was published especially for a major exhibit about the Trujillo Adobe, and it concludes with the following statement:

"Their pioneer days over...the people of La Placita and Agua Mansa continued to live a life rich in the heritage of their forefathers. A belief in the values of personal responsibility, business initiative, hospitality, and courage, combined with a strong loyalty to family and Church, continued to dominate their lives.

"To a great extent, this pattern remains evident to the present day."

In 2013, descendants of the New Mexican pioneers formed Spanish Town Heritage Foundation to raise public awareness of the inspiring legacy of their forebears and funds for the restoration of the Trujillo Adobe. They have already taken the first steps toward that goal. But their vision doesn't stop there. They want to develop a living history museum to tell the story of the New Mexican pioneers from Abiquiu and a cultural center around it so people will know and experience the meaning of this historical place. We support that goal.



L-11 Cont.



LETTER L (Page 7 of 8)

In 2014, neighborhood residents got together to discuss saving the treasures of the Springbrook Arroyo Watershed, including La Loma Hills, Pellissier Ranch, Trujillo Adobe, the arroyo itself, and many other worthy places that are threatened by inappropriate Industrial, commercial, and large-scale development. Out of these conversations came Springbrook Heritage Alliance and our proposal for a comprehensive parklands and walking trails system that would tie all these treasures together.

In 2015, the City of Riverside designated the Trujillo Adobe as a Historical Landmark to add to its previous county and State designations. That same year, members of our Alliance learned that Agua Mansa was connected to the Old Spanish Trail.

In 2016, the Agua Mansa Chapter of the Old Spanish Trail Association was established. Meantime, the National Park Service is finalizing the entire route of the official Old Spanish National Trail from Santa Fe to Los Angeles, which will put Agua Mansa, the Trujillo Adobe, old La Placita and La Loma Hills on the map whether the branch line is included or not. From Agua Mansa Road, where the old trail ran, the view of these hills is breath-taking at any time of year.

These misplaced factors of La Loma Hills' contribution to our heritage ought to be in the Roquet Ranch Project's Draft CEQA Report and Mitigated Negative Declaration.

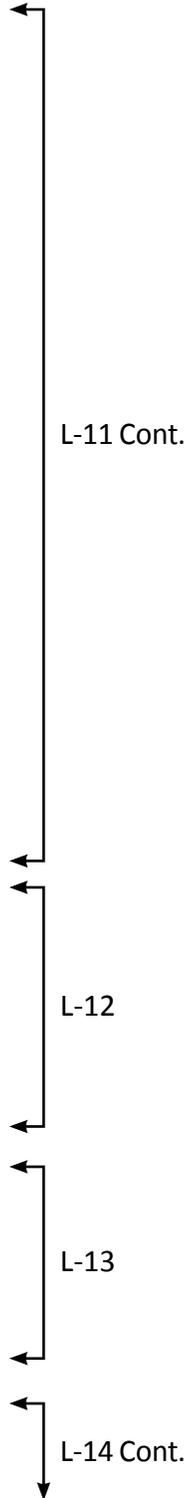
This means the data is incomplete and the conclusions reached for the Mitigated Negative Declaration are seriously flawed, as there are no mitigations possible to overcome the unilateral and irreversible damage this project would do to the unrecognized heritage of La Loma Hills and surrounding neighborhoods. We believe the EIR and Mitigated Negative Declaration should be rejected, and all the permit applications denied.

We are also concerned that a number of affected individuals and organizations were unable to review the document in time to prepare comments before the deadline. There are two main reasons for this: either they were unable to access the online document in a timely way because of problems with the link provided in the original notice, or they did not receive a notice about the release of the Draft CEQA Report early enough to review the document and offer comment before the deadline. Since so many people are affected, and so much is at stake, we request an extension to the public comment period.

Our next concern is that the timing of the Project creates a conflict of interest for the City of Colton over the \$4-million Inter-jurisdictional Riverside-Colton Northside Specific Plan. If the Roquet Ranch Project is approved before the NSP is finalized by both municipalities, it will compromise the deliberations of both cities. Therefore, we request that the City of Colton take whatever steps are necessary to postpone decision-making on the Roquet Ranch Project until after the NSP has been decided by both Riverside and Colton city councils.

Thank you for your consideration of our position.

Respectfully yours,





LETTER L (Page 8 of 8)

Sharon Trujillo-Kasner

↑
← L-14 Cont.



Northside Improvement Association / Spanish Town Heritage Foundation / Springbrook Heritage Alliance – Comment Letter L

L-1:

The City acknowledges the commenter’s opinion that the EIR is incomplete and inadequate, and disagrees for the reasons cited below. This comment does not identify any specific deficiencies in the analysis contained in the DEIR. It should be noted that an Environmental Impact Report (referred to herein as DEIR) was prepared, and not a Mitigated Negative Declaration as noted in this and in several other comments; thus, all comments referencing a Mitigated Negative Declaration in the comments provided by the commenter are assumed to refer to the DEIR.

L-2:

This comment accurately states that the Project would construct up to 1,050 residential dwelling units on a 336.2-acre site. The City acknowledges the commenter’s opinion that the Project is inappropriate for the site. Although the City’s decisionmakers will ultimately consider comments regarding the merits of the proposed Project during public hearings, this comment does not identify any specific deficiencies in the environmental analysis contained in the DEIR.

L-3:

This comment accurately states that the Project would result in significant and unavoidable impacts to the issue areas of aesthetics, air quality, and transportation/traffic, as disclosed in the DEIR. Additionally, the comment accurately states that the Project would generate 3,633 additional residents within the City of Colton. This comment incorrectly indicates that the Project would introduce 2,000-3,000 vehicles to the Project area; as disclosed on page 4.14-10 in DEIR Subsection 4.14, the Project actually would generate a total of 10,021 daily (weekday) vehicular trips. The increase in the population that would result from the Project (3,633 residents) was calculated based on the average household size of 3.46 that is cited in the City of Colton General Plan (1,050 dwelling units × 3.46 persons per household = 3,633 residents) (City of Colton, 2013a, Table LU-1). The 10,021 daily vehicle trips that would be generated by the Project was calculated based on the appropriate Institute of Transportation Engineers (ITE) trip generation codes cited in the Trip Generation Manual, 9th Edition, 2012, which are shown in Table 4-1 of the TIA (*Technical Appendix L*). While the commenter expresses the opinion that the vehicular trip generation and population estimates seem too low, substantial evidence was not introduced by the commenter indicating the reasoning for the assertion, nor was alternative methodology disclosed for calculating vehicular trip generation or population generation. By contrast, the population and traffic generation calculations included in the DEIR are supported by substantial evidence and reasonable assumptions and therefore reflect an accurate and conservative characterization of the Project’s potential intensity and associated environmental effects. This comment does not warrant any revisions to the DEIR.

L-4:

According to CEQA § 21002.1 (a), the “purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.” Accordingly, the DEIR



that was prepared pursuant to CEQA requirements is solely intended as an informative document. Pursuant to CEQA Guidelines § 15093(a), a lead agency (in this case, the City of Colton) must balance the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. Additionally, pursuant to CEQA Guidelines § 15093(b), when a lead agency approves a project which will result in the occurrence of significant effects which are identified in the final EIR but are not avoided or substantially lessened, the agency is required to state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. The lead agency's statement of overriding considerations must be supported by substantial evidence in the record. The statement of overriding considerations is also included in the record of the project approval and in the Project's Notice of Determination (NOD).

The DEIR achieves the purposes described above, and therefore is fully compliant with requirements under CEQA.

L-5:

Please see response to comment L-3 regarding the vehicular trip generation and population estimate assumptions used in the DEIR. The analysis included in the DEIR was conducted based on reasonable assumptions and substantial evidence supported by technical studies prepared by qualified professionals and other reference materials as cited in DEIR Section 7.0. The commenter does not introduce any specific evidence that any portion of the analysis is based on "unrealistic assumptions and faulty data."

L-6:

This comment accurately states that the DEIR concluded the Project would result in less-than-significant impacts, with the incorporation of mitigation measures identified in the DEIR, to scenic vistas, wildlife habitat, historic resources, lighting, noise, and public services. However, this comment does not identify any way in which the proposed Project would result in significant environmental effects to scenic vistas, wildlife, historic resources, light levels, noise levels, or public services that are not already documented in the DEIR. For a full evaluation of the Project's impacts to the resources and subjects listed above that support the DEIR's conclusion that impacts to these issue areas would be less than significant or reduced to less-than-significant levels with mitigation, refer to DEIR Subsections 4.1, *Aesthetics*, 4.3, *Biological Resources*, 4.4, *Cultural Resources*, 4.10, *Noise*, and 4.12, *Public Services*. Refer also to the response to comment L-7.

L-7:

The City acknowledges the comment stating that the Project would be visible for miles around. However, as demonstrated in Figure 4.1-4, *Miguel Bustamante Parkway Visual Simulation (Before & After)*, the Project has been designed to concentrate development in the flatter portions of the western area of the Project site, and generally preserves the prominent ridgelines, hillsides, and rock outcroppings that currently exist on-site. In doing so, the Project would effectively avoid any adverse effects to scenic vistas enjoyed from the public view points to the east of the Project site. The impacts associated with visual resources, including impacts to scenic vistas and impacts associated with light



and glare were thoroughly evaluated in Section 4.1, *Aesthetics*, of the DEIR, which disclosed that the proposed Project would result in significant and unavoidable impacts to scenic resources. However, as discussed under Threshold d of the DEIR, required compliance with the City's nighttime lighting standards (Chapter 18.42, *Performance Standards*, § 18.42.090, *Light*, and § 18.42.100, *Glare*, of the City's Zoning Code) and the applicable provisions of Section IV, *Design Guidelines*, of the Roquet Ranch Specific Plan, would ensure that the proposed Project would not produce substantial amounts of light from artificial lighting sources that would adversely affect the day or nighttime views of the surrounding area.

Comment L-7 inaccurately states the Project would eliminate or compromise 336.2 acres of natural habitat. As disclosed in Section 3.0 of the DEIR, the Project would preserve approximately 199.7 acres (59.4%) of the Project site as natural open space (shown as "Open Space-Resource" on Figure 3-3, *Specific Plan Land Use Plan*). Furthermore, Subsection 4.3, *Biological Resources*, of the DEIR concludes that with incorporation of the required mitigation measures, the Project would result in less-than-significant impacts to sensitive natural habitat within the physical disturbance areas depicted on Figure 3-11, *Proposed Physical Disturbances*.

Comment L-7 states that the Project would destroy or threaten ancient artifacts and historical sites. As discussed in DEIR Subsection 4.4, *Cultural Resources*, the Project-specific Cultural Resources Assessment (EIR *Technical Appendix F1*) identified two (2) archaeological resources (Site SBR-29,034 and Site SBR-29,037) at the Project site that are considered significant under CEQA. The Project avoids these two (2) significant archaeological resources and would be required to implement Mitigation Measure MM 4.4-1 to protect these resources during construction activities, and would implement Mitigation Measure MM 4.4-3 which would create easements to protect the two (2) resources throughout the operation of the Project. Mitigation Measure MM 4.4-2 would also require an archaeological monitor and Native American monitor to be present throughout grading activities to ensure that any inadvertent discoveries of undiscovered potentially significant subsurface cultural resources (including tribal cultural resources) during ground disturbance activities would not result in the destruction of such resources. Additionally, no significant historic resources (as defined in CCR § 15064.5) were identified at the Project site in the Cultural Resources Assessment (EIR *Technical Appendix F1*) or the City of Colton General Plan. Thus, the Project would not directly or indirectly result in the destruction of any ancient artifacts or historical sites, as erroneously asserted by this comment.

A Project-specific Noise Impact Analysis (*Technical Appendix K*) was prepared and utilized to evaluate the Project's noise impacts in Subsection 4.10, *Noise*, of the DEIR. As concluded in DEIR Subsection 4.10, the Project's noise impacts would be less than significant with the implementation of the required mitigation measures (including construction hours, designated staging areas, and proper operation and maintenance of construction equipment; installation of noise control barriers; and installation of windows with a minimum STC rating of 32). As a proposed residential community, the Project does not have the potential to expose off-site properties to noise levels that exceed applicable standards.



Lastly, comment L-7 states that the Project would result in demand on local public services which would lead to increases in taxes and fees. A project's impacts to taxes and other public fees is not within the scope of CEQA; as such, the Project's impacts to taxes and public fees were not evaluated in the DEIR. Subsection 4.12, *Public Services*, of the DEIR fully evaluates the Project's impacts to public services, including: fire protection, police protection, schools, parks, and other public facilities. The DEIR concluded that although the Project would result in an increase in demand for some public services, it would not necessitate the construction of new or expanded public facilities that could result in additional physical impacts that were not already addressed throughout the DEIR, and further concluded that implementation of the Project would not adversely affect service ratios, response times, or other performance objectives for the provision of public services. Accordingly, with mandatory payment of the City's development impact fees and school district fees, the Project would result in less-than-significant impacts related to public services. Additionally, the Project Applicant would be required to satisfy the City's development impact fee program requirements, which is intended to alleviate a project's financial impact to public service providers.

Based on the foregoing, the DEIR has fully evaluated the Project's impacts in the areas of aesthetics, biological resources, cultural resources, and public services, and the commenter has not introduced substantial evidence that the analysis provided in the DEIR related to these environmental subjects was deficient. As such, no revision to the DEIR was necessitated by this comment.

L-8:

The DEIR accurately concluded that the Project site is not officially designated as a scenic vista by the City of Colton General Plan. The determination of the locations of scenic vistas was made using objective criteria based on the City of Colton's designation of scenic vistas within the City. While the commenter expresses opinions regarding the quality of the views at of the Project site, the DEIR properly relied on objective criteria in the evaluation of the potential for impacts to scenic vistas and the commenter did not introduce substantial evidence that the criteria used in this evaluation was deficient. Moreover, the DEIR discloses that the Project would permanently alter the existing hillside setting that characterizes the visual character of the Project site resulting in a significant impact to visual resources and that there are no feasible mitigation measures that would reduce the Project's impacts to the visual quality of the site to levels that are less than significant. Accordingly, although the DEIR found that the Project site does not constitute a scenic vista per the City of Colton General Plan, the impacts to the visual resources on the Project site that are the subject of the commenter's concerns were fully disclosed in the DEIR as a significant and unavoidable impact.

L-9:

Comments regarding the ecology of the hills and the well-being and heritage of the community are acknowledged.

L-10:

The City acknowledges the commenter's appreciation for the biological and cultural significance of the La Loma Hills region within which the Project site is located. As previously stated above in the



City's response to comment L-7, the DEIR has fully evaluated the Project's impacts to biological and cultural resources in DEIR Subsections 4.3 and 4.4, respectively. With implementation of the required mitigation measures, the Project's impacts to biological resources and cultural resources would be reduced to levels below significance. The response to comment L-8 addresses concerns regarding impacts to visual resources. Therefore, no further analysis of these topics is required, and this comment does not warrant any revisions to the EIR.

L-11:

The commenter accurately states that the Project's Cultural Resources Assessment (EIR *Technical Appendix F1*) identified 25 archaeological sites within the Project's study area. It should be noted that only 16 of the 25 archaeological sites that were identified are located within the Project's area of physical disturbances (refer to Figure 3-11, *Proposed Physical Disturbances*). The DEIR does not disclose the precise location of these archaeological sites, and confidential information has been redacted from EIR *Technical Appendix F1* for purposes of public review. The purpose of this redaction is to avoid or limit the potential that these archaeological sites would be placed at risk of being defaced or destroyed. Subsection 4.4, *Cultural Resources*, of the DEIR is based on the Cultural Resources Assessment (EIR *Technical Appendix F1*) that determined that only two (2) of the archaeological sites (Site SBR-29,034 and Site SBR-29,037) on the Project site are significant under CEQA Guidelines § 21083.2 and both resources are located outside of the development footprint of the proposed Project. The Project would be required to implement Mitigation Measure MM 4.4-1 to protect Site SBR-29,034 and Site SBR-29,037 during construction activities, and would implement Mitigation Measure MM 4.4-3 which would create easements to protect Site SBR-29,034 and Site SBR-29,037 throughout the operation of the Project. Mitigation Measure MM 4.4-2 would also require an archaeological monitor and Native American monitor to be present throughout grading activities to ensure that any inadvertent discoveries of potentially significant subsurface cultural resources (including tribal cultural resources) during ground disturbance activities do not result in the destruction of such resources. With implementation of mitigation, the Project's impacts to archaeological resources would be reduced to below a level of significance.

The City appreciates and acknowledges the commenter's extensive interpretation of the cultural and historical setting for the Project site and the surrounding communities. The purpose of Subsection 4.4, *Cultural Resources*, of the DEIR is intended to provide a summary of the paleontological, archeological, and historical background of the Project area and evaluate whether significant historical and cultural resources (pursuant to CEQA Guidelines) would be impacted by the Project; it is not the intent of the DEIR to provide a comprehensive history of the region and/or the Project area. The DEIR adequately evaluates the Project's impacts to historical, archaeological, and tribal cultural resources, and no revisions to the EIR are necessary in response to this comment. Nonetheless, the commenter's comment letter, including the narrative describing the cultural and historical setting for the Project site and surrounding communities, are included in the Final EIR and record of decision for the proposed Project. Accordingly, no revision to the DEIR is warranted pursuant to this comment.



L-12:

The DEIR was circulated for a 45-day public review period between August 7, 2017 and September 21, 2017. The length of the DEIR public review period (45 days) adhered to the 45-day public review period required for EIRs that are submitted to the State Clearinghouse for review, pursuant to CEQA Guidelines § 15105 and § 21091(a). City staff was not made aware of any issues accessing the webpage where the DEIR was made available online, as noted in the Notice of Availability (NOA) for the Project. Furthermore, the CEQA statutes or guidelines do not require making NOAs or DEIRs available online. Additionally, in accordance with CEQA Guidelines § 15087(a), the City provided the DEIR and NOA to all organizations and individuals who have previously requested such notice in writing prior to the commencement of the 45-day public review period for the DEIR. The City directly mailed the NOA to owners and occupants of properties located within a 1,000-foot radius of the Project site prior to the commencement of the 45-day public review period. An electronic copy of the DEIR was available for download using the hyperlink provided in the NOA for the full 45-day public review period. Hard copies of the DEIR with reference documents and technical appendices on CD were made for the public to review at the following locations for the full 45-day public review period:

- City of Colton Planning Division, located at 659 N. La Cadena Drive Colton, CA;
- Colton Public Library (main branch), located at 656 North 9th Street, Colton, CA;
- Colton Public Library (Luque Branch), located at 294 East “O” Street, Colton, CA; and
- Colton City Clerk Office, located at 650 N. La Cadena Drive, Colton, CA.

Based on the foregoing, the public review period provided for the DEIR fully adhered to the applicable requirements established in § 15105, § 15087, and § 21091 of the CEQA Guidelines.

L-13:

The City acknowledges the commenter’s concerns regarding the sequencing of the proposed Project with the development and approval of the Northside Specific Plan. The Roquet Ranch Specific Plan and the Northside Specific Plan are two distinct projects that would occur on separate properties. The purpose of the Roquet Ranch EIR is to evaluate the physical environmental impacts that would result from implementation of the proposed Roquet Ranch Specific Plan. At the time that the Notice of Preparation was filed and the DEIR was prepared, applications for the Northside Specific Plan had not yet been filed. Although the City of Riverside is undergoing a public workshop process to assess the community’s desires with regards to the potential land uses that may be planned within the Northside SP boundary, the development of the SP has not reached a point where the specific land uses have been identified or stabilized for evaluation. Accordingly, because the land use plan associated with the Northside SP has not been identified, any evaluation of the development of the Northside SP would not be reasonable or practical as it would be highly speculative. This comment does not identify address any specific deficiency within the DEIR, and therefore does not necessitate any further analysis or revisions in the DEIR.

L-14:

The positions of the commenter are acknowledged and will be considered by the decisionmakers during deliberations over whether to approve, approve with conditions, or deny the proposed Project.



LETTER M (Page 1 of 10)

From: Karen Renfro [<mailto:k.a.renfro7@gmail.com>]
Sent: Thursday, September 21, 2017 10:40 AM
To: Mario Suarez <msuarez@coltonca.gov>; mtomich@coltonca.gov; Shawn Nevill <sneville@tbplanning.com>
Cc: isuchil@ci.colton.ca.us; doro@ci.colton.ca.us; Murray, David <dmurray@riversideca.gov>; Brian Mooney <bmooney@rickengineering.com>; Eva Yakutis <evayakutis@gmail.com>; Joan Isaacson <jisaacson@kearnswest.com>; Joel Farkas <joelharkas@gmail.com>; camtrans@aol.com; Charles Brown <cbrown@cbarchitect.org>; skelleher@riversideca.gov; Eguez, Judy <jeguez@riversideca.gov>; info@springbrookheritagealliance.org; NorthsideIA@yahoogroups.com; Nancy Melendez <nancy.melendez@icloud.com>; osta.aguamansa@gmail.com; OSTA SoCal <ostasocal@gmail.com>; erin snyder <epolcene@juno.com>; Sharon Kasner <skasner@sbcglobal.net>; Alicia Robinson <arobinson@pe.com>; City News <news@citynewsgroup.com>; colton@citynewsgroup.com; Ardie Barnett <highgrovenews@roadrunner.com>; City Desk <citydesk@inlandnewspapers.com>; Mark Acosta <macosta@scng.com>
Subject: RE: ROQUET RANCH PROJECT DRAFT EIR SCH No. 2016061056

NORTHSIDE IMPROVEMENT ASSOCIATION
SPANISH TOWN HERITAGE FOUNDATION
SPRINGBROOK HERITAGE ALLIANCE
OSTA - AGUA MANSA CHAPTER
Riverside - Colton - Highgrove - Grand Terrace
California U.S.A.

September 21, 2017

Mario Suarez, Senior Planner
Planning Department
City of Colton
659 North La Cadena Drive
Colton, California 92324

ROQUET RANCH PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT
SCH No. [2016061056](#)

Dear Mr. Suarez:

Although the massive size of this Draft Environmental Impact Report for the Roquet Ranch Project (3,000+ pages) suits the subject, it cannot be considered complete.

A brief scan of only some of the material reveals unacceptable inadequacies in the research resulting in unsupportable conclusions in the Mitigated Negative Declaration. A more thorough review brings to light a number of alarming issues.

←
M-1
←



LETTER M (Page 2 of 10)

However, even if the Report was perfect in every detail, the fact remains that that this Project, which proposes construction of up to 1,050 housing units on 336.2 acres in a location as sensitive as La Loma Hills, is entirely inappropriate for either the hills or surrounding communities.

←
M-2
←

The EIR itself admits there are no mitigations that will overcome "significant and unavoidable" environmental impacts to Aesthetics, Air Quality, and Transportation that will result from an anticipated increase in population by 3,633 and more than 2,000-3,000 vehicles. The population and vehicle estimates seem too low, which means things could very well end up far worse than the EIR anticipates.

←
M-3
←

The transportation issue is especially critical: the only ingress and egress to the development is by Orange Street and a yet-to-be established connector to West La Cadena Drive. These outlets would then feed into the 215 freeway at Center Street or west to Riverside Avenue. The existing arterials are already heavily used while freeway access at Center is currently a planning nightmare.

←
M-4
←

Up to 3,000 more vehicles per day (a conservative estimate) cannot be supported by current infrastructure, but the proposed mitigations would only create new problems without resolving the old ones. These are not issues that should be trifled with.

←
M-5
←

As all these factors have bearing on Quality of Life issues, these findings alone should be enough to deny approval for the project. However, the law allows city officials to dismiss any or all of them, and thus the EIR seems more like a charade than a means of protecting us and the places that give meaning to our lives, as the law was intended to be.

←
M-6
←

On all other issues the EIR finds the potential harmful effects can be mitigated to achieve a desired level of compliance with environmental standards. Many of the mitigations, however, are based on unrealistic assumptions and faulty data about the effects of a project this size on the immediate area of La Loma Hills and the neighborhoods just beyond. These assumptions include the faulty projections of increased population and vehicle trips mentioned above. Thus, the conclusions are not reliable.

←
M-7
←

For example, the EIR finds that building a thousand homes for more than three thousand people and their several thousand cars on La Loma Hills would cause "no significant effect" to scenic vistas, wildlife habitat, historic resources, light and noise levels, water and power utilities, public services, and so forth.

←
M-8
←

A comparison of the layout to the actual views of the hills makes clear that most of the dwellings will be visible for miles around, that 336.2 acres of natural habitat will be forever eliminated or permanently compromised, that ancient artifacts and historical sites will of necessity be destroyed or threatened, that the night sky will be lit with a multitude of streetlamps and houselights, that lawn-mowers and leaf-blowers and boom-boxes and motors and engines and illegal fireworks and chain-saws and street-sweepers and street repairs and other nuisances of modern life will add to the background roar of the freeway, that demand on local public services will necessarily lead to increases in taxes and fees, and so forth.

←
M-8 Cont.
←

There is nothing logical or reasonable about the EIR'S finding that because La Loma Hills has not been designated as a "scenic vista" within the City of Colton nobody's view will be marred by the



LETTER M (Page 3 of 10)

new streets and hundreds of homes on its east, south and west sides where now we see beautiful rugged slopes, rolling meadows and twisting layers of geological history.

This absurd conclusion denies a fact of great significance to our communities. These hills have long been a beloved scenic landmark to many thousands of people who live in the heart of the Santa Ana River Watershed, and they are no less so for lack of a designation by a governing authority. Perhaps it is time they were, for the integrity of La Loma Hills should not be trifled with.

However, we did find some aspects of the EIR to be helpful, as it does admit to certain considerations that we believe should be given priority over all others--the ecological integrity of the hills, the well-being of the surrounding communities, and the heritage of the people who live here:

1. First, La Loma Hills is a distinctive natural feature that has served human and animal populations in many capacities down through the ages, and still does in our own time precisely because they have not been developed.
2. Second, the communities which sprang up around these hills over the millennia have always benefitted, and still do, from their proximity to a charming unspoiled landmark.
3. Third, the history of the many peoples who came here revolves around these hills, and therefore La Loma Hills is central to our local history and heritage.

The EIR provides a detailed report on 25 known archeological sites on La Loma Hills, a mixed blessing in that this revelation is of great value to all of us, but it also means that the artifacts are now in danger of being defaced or destroyed by vandals, vagrants, and uninformed hikers. If the project is approved, the danger will be increased. Placing chain-link fences around them is not a solution.

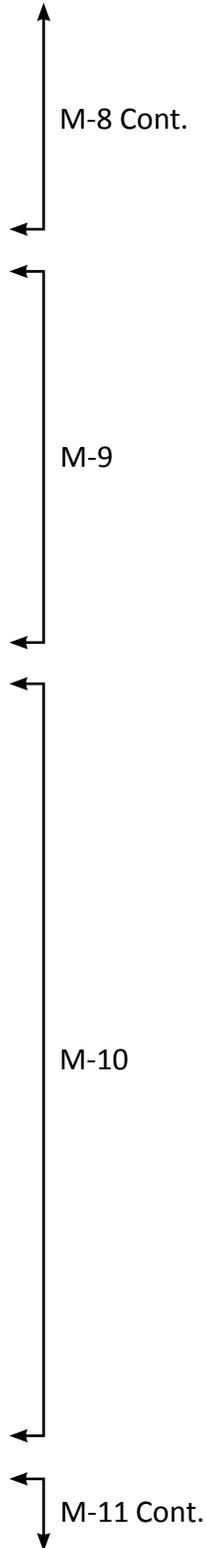
Yet, the EIR does not grasp the significance of these artifacts or their location, for both are dismissed as inconsequential. There is every reason to believe these hills were considered sacred by the native peoples who came here--including the People of the West, People of the Highlands, People of the Pines and Speakers of the Language whom we know as Tongva, Serrano, Luiseno and Cahuilla.

Some of the artifacts appear to be fertility symbols, and prior to a sequence of floods and earthquakes in the 20th Century, there used to be hot springs, cold springs and Sulphur springs in the flood plain to the south of the hills. La Loma Hills marks the territorial borders of these often-warring native peoples, and they used to come here for the waters. They believed the Creator had given them hot springs to mark a place of peace, as a blessing.

That means both the hills and the flood plain below them were considered sacred for different reasons, and their proximity to each other may not be coincidental. That legacy is part of our community heritage, and it should not be trifled with.

If we don't place value on our community treasures, who will? Elsewhere--in places like Stonehenge, Easter Island, and Peru--mysterious ancient artifacts are protected and cherished as cultural assets, and people come from all over the world to see them. It doesn't seem to matter whether they are great or small.

Our singular set of granitic upheavals play a featured role in the history of human settlement in the Santa Ana River Watershed which runs from the top of the San Bernardino Mountains to the Pacific





LETTER M (Page 4 of 10)

Ocean. La Loma Hills is located in the heart of this watershed, slightly north of the less well-known Springbrook Arroyo Watershed which runs from the escarpment that bifurcates Pigeon Pass to the Santa Ana River.

The Initial Study of this CEQA Report correctly states that settlement in our immediate area goes back several thousand years; itemizes the two dozen native archeological sites mentioned above on La Loma Hills alone; mentions three local native tribes, the Spanish Mission and Mexican periods, the Mormon Colony at San Bernardino, the Lugos, the founding of Colton, the Trujillo Ditch (now called the Trujillo Water Company), Arthur Roquet and his ranch, and a surprisingly short list of other topics.

All these rightfully belong in the document. But there is so much more that was left out. It is shocking to us that professional researchers could have failed to uncover anything else that would illuminate the La Loma Hills landscape and its secrets.

The study should have told us why the Trujillo Ditch is cited twice, why "The Agua Mansa Story" by Bruce Harley (*San Bernardino County Museum, 1991*) is listed in the bibliography, and what Pellissier Ranch was and how it came to be. But that isn't all.

The question must be asked why it is that the Cultural Study is so seriously deficient when research into any one of the above topics usually leads others to further discoveries of compelling significance to the history of La Loma Hills. The combined resources of local libraries, museums and bookstores in the Colton-San Bernardino-Redlands-Loma Linda-Grand Terrace-Highgrove-Riverside area form a fairly comprehensive archival treasury for research and are well-used by local historians, scholars and history buffs.

An adequate Cultural Study would have covered most of the following topics in addition to the few that were provided for the Roquet Ranch Project's EIR:

- Santa Ana River Watershed
- Cajon Pass
- Mission San Gabriel
- Old Mission Road
- Town of San Bernardino
- San Bernardino Estancia
- Old Spanish Trail
- Horse Thief Canyon
- Reche Canyon
- Pigeon Pass
- Springbrook Arroyo
- Chief Wakara
- Politana
- Guachama
- Don Juan Bandini
- Rowland-Workman Party
- Benjamin Franklin "Don Benito" Wilson
- Manuel "Don Lorenzo" Trujillo
- Juan Antonio

M-11 Cont.

M-12

M-13

M-14 Cont.



LETTER M (Page 5 of 10)

- Jurupa Rancho
- Parish of San Salvador
- Battle of Pigeon Pass
- Agua Mansa
- La Placita de los Trujillos
- La Loma School
- Church of San Salvador
- Bell of San Salvador
- Township of San Salvador
- Agua Mansa Cemetery
- Flood of 1862
- Trujillo Family Adobe
- Trujillo School
- Trujillo Cantina
- Antoine Pellissier
- Pellissier Ranch Dairy and Winery
- Trujillo Water Company
- The Grange

M-14 Cont.

All of these and more should have been included in the Cultural Studies because La Loma Hills played a significant role in their histories.

Here follows a brief account of the part of that history that has bearing on the decision about the Roquet Ranch Project:

In Spanish California days, Mission San Gabriel rancho holdings stretched from the Pacific Ocean to the Coachella Valley, encompassing territories from a number of native tribes. After Mexican Independence in 1822 the California mission-system was broken up and their vast holdings were distributed in the form of government grants by agents from the new government to gentlemen who qualified for the privilege.

One of the grantees, a Peruvian-born son of Italian immigrants named Juan Bandini, obtained 31,000 acres of former Mission San Gabriel's holdings in 1838 which he called "Jurupa Rancho". It was a fine place to graze his livestock, and there was a road for mule-trains that ran through his property along the west side of the Santa Ana River from the San Bernardino Estancia to Mission San Gabriel. Except for the outlaws who came by to raid his ranch on nights of the full moon, his was a good situation.

M-15 Cont.

In 1842, a group of about one hundred men, women and children lead by Lorenzo Trujillo left Abiquiu, New Mexico, walking more than a thousand miles on a trade-route that later became known as the "Old Spanish Trail" from Abiquiu, New Mexico, to a promised land called California.

They were offspring of Pueblos, Comanches and other native tribesmen captured by enemy warriors and then sold into slavery. Sometimes they were sold to the Spanish colonial gentry. The offspring of those pioneers, though outcasts of both native and colonial society, were raised as *Genizaros* by the Spanish grandee to act as peacekeepers.



LETTER M (Page 6 of 10)

NPR recently aired a program about the Genizaros of Abiquiu. That story is part of the heritage of La Loma Hills.

By tradition, Genizaros were trained to fight, and their adversaries were the hostile tribes who had captured their fathers and grandfathers in raids on the homes, villages and estates of peace-loving people, whether native or Spanish. They were also shepherds by occupation, stockmen by vocation and horsemen by affinity. Those who went with Lorenzo Trujillo were headed for San Bernardino where they had a job working for Don Jose del Carmen Lugo.

Their assignment was to rid the neighborhood of vicious cut-throats who made a living stealing cattle and horses from the ranches. This they were more than ready, willing and able to do. They settled in nearby Politano, but the deal fell through.

However, as it happened, Trujillo ended up with a better offer from Don Juan Bandini to protect Rancho Jurupa in exchange for a two thousand-acre section of his land. La Loma Hills was a landmark feature of the Bandini Donation and marked the corner of the grant.

The New Mexican pioneers established two little villages, one on either side of the river: Agua Mansa on the western side and La Placita de los Trujillos on the eastern side, planted on the alluvial fan below the hills. Interestingly, when Don Benito Wilson transferred the land to the pioneers on behalf of Bandini, each head of a family received their own strip of land with frontage on the river, and access to the tableland above. Now the Genizaro pioneers were no longer outcasts. They were leaders in a new society, and ten years later the menfolk were voting in the historical Presidential election of 1852.

Besides serving as a land-grant boundary and picturesque backdrop for everyone who came through Agua Mansa from Cajon Pass, La Loma Hills was a handy lookout for Lorenzo's sons who had the job of keeping the peace. Even at lower elevations and on a moonlit night, they had a clear view from the hills across the valley to a place below the pass just ten miles away as the crow flies. It is probably one of the factors that gave them the advantage in the historic Battle of Pigeon Pass (1845).

La Loma Hills was also a refuge in times of emergencies. During the famous Flood of 1862, when Agua Mansans fled to the bluffs above the old Mission road that connected their village to the Old Spanish Trail, Placitanos escaped to the hills behind their homes.

Not one life was lost on either side of the river, for the padre was on watch that night. He heard the roar of the floodwaters heading their way, and rang the bell that stood in the yard of the Church of San Salvador in time for everyone to get out of harm's way. Agua Mansa and La Placita were washed away, including the Trujillo family homestead.

The people of San Salvador rebuilt their villages on higher ground. After that, they farmed their fields in the bottom-land, built their homes above the higher-water mark and grazed their livestock on their village commons--the tablelands and hillside meadows. Many of their descendants still live in the neighborhoods around Agua Mansa, Belltown and La Loma Hills, including Riverside's Northside.

The Trujillo Adobe was rebuilt in the shadow of La Loma Hills at the corner of present-day North Orange, Center Street and Old Pellissier Road in 1862. It has in our time been designated as a historical landmark (City of Riverside, 2015), historical site (County of Riverside, 1968) and point of interest (State of California, 1968). It is the oldest non-native dwelling in Riverside County, and not

M-15 Cont.



LETTER M (Page 7 of 10)

a few local residents who once called it home. It is a significant landmark with an intimate connection to the history of La Loma Hills. That connection should not be trifled with.

In 1905 Antoine Pellissier acquired 500 acres of what had once been La Placita. He established his ranch on the foundations of both the original and the second village squares which can be presumed to be covered with a foot of soil. His dairy and winery were successful enterprises through the 1960s, the neighborhood around La Loma Hills is still home to some of his descendant, also. Ruins of his ranch are still visible from the Trujillo Adobe and Agua Mansa.

The people of La Placita, Agua Mansa, Colton, Highgrove, Riverside and Grand Terrace were not discrete societies unto themselves. They lived side by side and their histories are deeply intertwined with one another. They still do, and they are us.

We cannot understand who we are and where we live if we do not realize this most important fact of our local heritage. The boundaries created by modern jurisdictions do not reflect the relationship of the people who live here to the places they call home.

In 1912 Northside residents established Riverside's first neighborhood association for the purpose of protecting their rural agricultural lifestyle and bringing certain amenities to their community. They are one of the reasons for the stability of the neighborhood, and they are committed to passing the heritage of La Placita on to the generations to come.

In 1990, when the undeveloped rural agricultural properties adjacent to single-family residential parcels on both sides of the county line were rezoned as Industrial-BMP and commercial, the integrity of the old neighborhoods around La Loma Hills in Colton and Riverside was compromised. This is one of the reasons residents from both jurisdictions asked the cities for a neighborhood Specific Plan.

We are not integers in a matrix of statistics. We are individual human beings. Some of us have ancestors who built the old communities, whose names are familiar to this day. Others of us came later, but we are proud to call the neighborhoods around La Loma Hills home. We are the recipients of a special inheritance, a heritage peculiar to this particular place on the map, a place of peace, tranquility, and good will.

Joyce Carter Vickery gave us insight into this inheritance in her ground-breaking book "Defending Eden: New Mexican Pioneers in Southern California 1830-1890" (UCR History Department and Riverside Museum Press, 1977). It was published in conjunction with a Riverside Museum exhibit about the Trujillo Adobe, and she concludes with the following statement:

"Their pioneer days over...the people of La Placita and Agua Mansa continued to live a life rich in the heritage of their forefathers. A belief in the values of personal responsibility, business initiative, hospitality, and courage, combined with a strong loyalty to family and Church, continued to dominate their lives.

"To a great extent, this pattern remains evident to the present day..."

These are not values that should be trifled with.

In 2013, descendants of the New Mexican pioneers formed Spanish Town Heritage Foundation to raise public awareness of the inspiring legacy of their forebears and funds for the restoration of the



M-15 Cont.



LETTER M (Page 8 of 10)

Trujillo Adobe. They have already taken the first steps toward that goal. But their vision doesn't stop there.

They want to develop a living history museum to tell the story of the New Mexican pioneers from Abiquiu and a cultural center around it so people will know and experience the meaning of this historical place. We support that goal, and they share our vision for saving the community treasures of the Springbrook Arroyo Watershed, including La Loma Hills.

In 2014, neighborhood residents got together to discuss saving the treasures of the Springbrook Arroyo Watershed, including La Loma Hills, Pellissier Ranch, Trujillo Adobe, the arroyo itself, and many other worthy places that are threatened by inappropriate Industrial, commercial, and large-scale development. Out of these conversations came Springbrook Heritage Alliance and our proposal for a comprehensive parklands and walking trails system that would tie all these treasures together.

In 2015, the City of Riverside designated the Trujillo Adobe as a Historical Landmark to add to its previous county and State designations. That same year, members of our Alliance learned that Agua Mansa was connected to the Old Spanish Trail.

In 2016, the Agua Mansa Chapter of the Old Spanish Trail Association was established. Meantime, the National Park Service has been finalizing the entire route of the official Old Spanish National Trail from Santa Fe to Los Angeles, which will put Agua Mansa, the Trujillo Adobe, old La Placita and La Loma Hills on the map whether the branch line is included or not. From Agua Mansa Road, where the old trail ran, the view of these hills is breath-taking at any time of year.

This is not a treasure to be trifled with.

These misplaced factors of La Loma Hills' contribution to our heritage ought to be in the Roquet Ranch Project's Draft CEQA Report and Mitigated Negative Declaration. But, they are not.

This means the Draft EIR for the Roquet Ranch Project is incomplete and the conclusions reached for the Mitigated Negative Declaration are seriously flawed. There are no mitigations possible to overcome the unilateral and irreversible damage this project would do to the irreplaceable heritage of La Loma Hills and surrounding neighborhoods.

In closing:

- We request an extension to the public comment period for the Roquet Ranch Project's Draft EIR. A number of affected individuals and organizations were unable to review the document in time to prepare comments before the deadline. Some were unable to access the online document in a timely way because of problems with the link provided in the original notice which set them back three to four weeks. Others did not receive notification of the release of the Draft CEQA Report early enough to review the document and comment before the deadline.
- We request that the City of Colton take whatever steps are necessary to postpone decision-making on the Roquet Ranch Project until after the \$4 million Riverside-Colton Northside Specific Plan has been voted on by both Riverside and Colton city councils. The timing of the Project appears to create a conflict of interest for the City of Colton over the \$4-million Inter-jurisdictional Riverside-Colton Northside Specific Plan. If the Roquet Ranch Project is

M-15 Cont.

M-16

M-17

M-18 Cont.



LETTER M (Page 9 of 10)

approved before the NSP is finalized by both municipalities, it will compromise the deliberations of both.

↑ M-18 Cont.
←

Failing that, we request that the City of Colton reject the proposed Mitigated Negative Declaration and deny the permit applications for the Roquet Ranch Project.

← M-19
←

Thank you for your consideration of our position.

←

Respectfully yours,

Karen Renfro, Chairman
Springbrook Heritage Alliance
P.O. Box 745
Riverside, California 92502
[\(951\)787-0617](tel:(951)787-0617)
info@springbrookheritagealliance.org

Pete Wohlgemuth, President
Northside Improvement Association
701 North Orange Street
Riverside, California 92501
[\(951\)961-7511](tel:(951)961-7511)
NorthsideYahooGroups@yahoo.com

Nancy Melendez, President
Spanish Town Heritage Foundation
3643 University Avenue
Riverside, California 92501
[\(951\)235-3586](tel:(951)235-3586)
nancy.melendez@icloud.com

Maria Yeager, President
OSTA-Agua Mansa Chapter
3643 University Avenue
Riverside, California 92501
[\(951\)453-9686](tel:(951)453-9686)
osta.aguamansa@gmail.com

Erin Snyder, Member of the Board
Reid Park Advisory Team
701 North Orange Street
Riverside, California 92501
[\(951\)682-9128](tel:(951)682-9128)
epolcene@yahoo.com

Sharon Trujillo-Kasner
Descendant of Lorenzo Trujillo

M-20 Cont.





LETTER M (Page 10 of 10)

Riverside, California

SOME ADDITIONAL REFERENCES:

A Colony for California

Tom Patterson (Third Edition 2013, Riverside Museum Press)

Along the Old Roads

Steve Lech (2004)

Riverside County, California: Place Names, Their Origins and Their History

Jane Davies Gunther (1984)

The Old Spanish Trail: Santa Fe to Los Angeles

Hafen & Hafen (1993, Bison Books)

California 1850: A Snapshot in Time

Janice Marschner (2000, Coleman Ranch Press)



M-20 Cont.



Northside Improvement Association / Spanish Town Heritage Foundation / Springbrook Heritage Alliance / OSTA – Agua Mansa Chapter – Comment Letter M

M-1:

The City acknowledges the commenter’s opinion that the EIR is incomplete and inadequate. The commenter does not identify any specific deficiencies in the analysis contained in the DEIR. The comment inaccurately refers to the DEIR as a Mitigated Negative Declaration in this comment and in several other comments. As a Mitigated Negative Declaration has not been prepared for the Roquet Ranch Specific Plan Project, all comments referencing a Mitigated Negative Declaration in the comments provided by the commenter are assumed to refer to the DEIR.

M-2:

This comment accurately states that the Project would construct up to 1,050 residential dwelling units on a 336.2-acre site. The City acknowledges the commenter’s opinion that the Project is inappropriate for the site. Although the City’s decisionmakers will ultimately consider comments regarding the merits of the proposed Project during public hearings, this comment does not identify any specific deficiencies in the environmental analysis contained in the DEIR.

M-3:

Please see response to comment M-2.

M-4:

Subsection 4.14, *Transportation and Traffic*, is based on the Project-specific TIA (EIR *Technical Appendix L*) that was prepared in accordance with the San Bernardino County Congestion Management Program (CMP) *Guidelines for CMP Traffic Impact Analysis Reports* (Appendix “C”, 2005 Update), the California Department of Transportation (Caltrans) *Guide for the Preparation of Traffic Impact Studies* (December 2002), and consultation with City of Colton staff during the scoping process. (Urban Crossroads, 2016, p. 1). The TIA fully evaluates the Project’s impacts to transportation facilities where the Project would contribute 50 or more peak hour trips, which included 39 intersections, 35 roadway segments, six freeway mainline segments, and six freeway merge/diverge ramp junctions. As described in EIR subsection 4.14.6, instances where the Project would worsen an existing deficiency are identified as significant impacts.

This comment accurately describes the proposed access to the Roquet Ranch development, which would include the extension of Orange Street to Center Street, and the construction of access to the southeast area of the Project site from La Cadena Drive via the future Pellissier Road. Site access was disclosed in Subsection 4.14, *Transportation and Traffic*, of the DEIR and the Project’s TIA (EIR *Technical Appendix L*). The commenter’s concerns regarding the existing and future traffic congestion along Center Street and Riverside Avenue, as well as access to the I-215 from Center Street are noted. Pursuant to the Traffic Study Scoping Agreement (Appendix 1.1 of the Project-specific TIA [EIR *Technical Appendix L*]) approved by the City of Colton, the TIA evaluated the Project’s impacts at three (3) intersections (Intersections #5, #14, and #32 in the DEIR and TIA) and two (2) roadway



segments (roadway segments #18 and #19) along Center Street. Additionally, the Project's TIA evaluated the Project's impacts to the intersection of South Riverside Avenue/Main Street/Placentia Lane (noted as Intersection #1 in the DEIR and TIA). Lastly the TIA also evaluated the Project's impacts to freeway merge/diverge ramp junctions where vehicles would access the I-215 from Center Street, which includes freeway merge/diverge ramp junctions #2, #3, #5, and #6 (as noted in the DEIR and TIA). The Project's impacts to these intersections and roadway segments are fully evaluated and disclosed in Subsection 4.14, *Transportation and Traffic*, of the DEIR. Where the Project was determined to result in significant direct or cumulatively considerable impacts to a transportation facility, the DEIR has imposed all available feasible mitigation to reduce the Project's impacts to the facility to a level below significance. After implementation of the mitigation measures imposed in the DEIR would require direct roadway improvements and payment of fair share fee payments to fund roadway improvements necessary for study intersections to operate at acceptable levels of service. However, even after mitigation, the Project's impacts on a number of roadway facilities would remain significant and unavoidable since: a) the facilities are either located outside of the geographic limits of the City of Colton, or b) the improvements are not part of an established City of Colton fee program and there is no assurance that the improvements will be implemented at their time of need, resulting in unavoidable short-term impacts. There is no evidence to support the commenter's claim that the proposed mitigation measures would worsen traffic conditions. This comment does not warrant any revisions to the DEIR.

M-5:

The City acknowledges the commenter's objection to the Project. The City's decisionmakers will ultimately consider comments regarding the merits of the proposed Project during public hearings. To the extent that "quality of life" issues are related to environmental factors, these issues have been addressed in the DEIR; however, "quality of life" issues that are unrelated to environmental effects are not within the purview of the CEQA process.

Commenter is correct that under CEQA, a lead agency (in this case, the City of Colton) may approve a project despite its significant environmental effects if it finds that the environmental effects of a project are balanced by economic, legal, social, technological, or other benefits. In the case of the proposed Project, and as disclosed in the DEIR, impacts to the issue areas of aesthetics, air quality, and transportation/traffic would remain significant and unavoidable even after the application of mitigation measures. As part of its review of the proposed Project, the decisionmakers will consider whether the economic, legal, social, technological, or other benefits of the proposed Project outweigh the Project's significant unavoidable impacts to aesthetics, air quality, and transportation/traffic. Pursuant to CEQA Guidelines § 15093(b), if the City of Colton approves the Project despite its significant effects to the environment that cannot be avoided or substantially lessened by mitigation or Project design feature, the City of Colton would be required to state in writing the specific reasons to support its action based on the final EIR and/or other information in the record. No revision to the EIR is warranted pursuant to this comment.

M-6:

The DEIR discloses that the Project would result in an increase in the City's population by 3,633 residents, which was calculated based on the average household size of 3.46 that is cited in the City of



Colton General Plan (1,050 dwelling units \times 3.46 persons per household = 3,633 residents). (City of Colton, 2013a, Table LU-1) With respect to vehicle trips, EIR Subsection 4.14 discloses that the Project would generate a total of 10,021 daily (weekday) vehicular trips, which was calculated based on the appropriate Institute of Transportation Engineers (ITE) trip generation codes cited in the Trip Generation Manual, 9th Edition, 2012, which are shown in Table 4-1 of the TIA (Technical Appendix L). While the commenter expresses the opinion that the vehicular trip generation and population estimates seem too low, substantial evidence was not introduced by the commenter indicating the reasoning for the assertion, nor was alternative methodology disclosed for calculating vehicular trip generation or population generation.

M-7:

This comment accurately states that the DEIR concluded the Project would result in less-than-significant impacts, with the incorporation of mitigation measures identified in the DEIR to scenic vistas, wildlife habitat, historic resources, lighting, noise, and public services.

The City acknowledges the comment stating that the Project would be visible for miles around. However, as demonstrated in Figure 4.1-4, *Miguel Bustamante Parkway Visual Simulation (Before & After)*, the Project has been designed to concentrate development in the flatter portions of the western area of the Project site, and generally preserves the prominent ridgelines, hillsides, and rock outcroppings that currently exist on-site. In doing so, the Project would effectively avoid any adverse effects to scenic vistas enjoyed from the public view points to the east of the Project site. The impacts associated with visual resources, including impacts to scenic vistas and impacts associated with light and glare were thoroughly evaluated in Section 4.1, *Aesthetics*, of the DEIR, which disclosed that the proposed Project would result in significant and unavoidable impacts to scenic resources.

This comment inaccurately states the Project would eliminate or compromise 336.2 acres of natural habitat. As disclosed in Section 3.0 of the DEIR, the Project would preserve approximately 199.7 acres (59.4%) of the Project site as natural open space (shown as "Open Space-Resource" on Figure 3-3, *Specific Plan Land Use Plan*). Furthermore, Subsection 4.3, *Biological Resources*, of the DEIR concludes that with incorporation of the required mitigation measures, the Project would result in less-than-significant impacts to sensitive natural habitat within the physical disturbance areas depicted on Figure 3-11, *Proposed Physical Disturbances*.

This comment incorrectly states that the Project would destroy or threaten ancient artifacts and historical sites. As discussed in DEIR Subsection 4.4, *Cultural Resources*, the Project-specific Cultural Resources Assessment (EIR *Technical Appendix F1*) identified two (2) archaeological resources (Site SBR-29,034 and Site SBR-29,037) at the Project site that are considered significant under CEQA. The Project avoids these two (2) significant archaeological resources and would be required to implement Mitigation Measure MM 4.4-1 to protect these resources during construction activities, and would implement Mitigation Measure MM 4.4-3 which would create easements to protect the two (2) resources throughout the operation of the Project. Mitigation Measure MM 4.4-2 would also require an archaeological monitor and Native American monitor to be present throughout grading activities to



ensure that any inadvertent discoveries of undiscovered potentially significant subsurface cultural resources (including tribal cultural resources) during ground disturbance activities would not result in the destruction of such resources. Additionally, no significant historic resources (as defined in CCR § 15064.5) were identified at the Project site in the Cultural Resources Assessment (EIR *Technical Appendix F1*) or the City of Colton General Plan. Thus, the Project would not directly or indirectly result in the destruction of any ancient artifacts or historical sites, as erroneously asserted by this comment.

As discussed under Threshold d of Subsection 4.1 of the DEIR, required compliance with the City's nighttime lighting standards (Chapter 18.42, *Performance Standards*, § 18.42.090, *Light*, and § 18.42.100, *Glare*, of the City's Zoning Code) and the applicable provisions of Section IV, *Design Guidelines*, of the Roquet Ranch Specific Plan, would ensure that the proposed Project would not produce substantial amounts of light from artificial lighting sources that would adversely affect the day or nighttime views of the surrounding area.

With respect to noise, a Project-specific Noise Impact Analysis (*Technical Appendix K*) was prepared and utilized to evaluate the Project's noise impacts in Subsection 4.10, *Noise*, of the DEIR. As concluded in DEIR Subsection 4.10, the Project's noise impacts would be less than significant with the implementation of the required mitigation measures (including construction hours, designated staging areas, and proper operation and maintenance of construction equipment; installation of noise control barriers; and installation of windows with a minimum STC rating of 32). As a proposed residential community, the Project does not have the potential to expose off-site properties to noise levels that exceed applicable standards.

Lastly, this comment states that the Project would result in demand on local public services which would lead to increases in taxes and fees. A project's impacts to taxes and other public fees is not within the scope of CEQA; as such, the Project's impacts to taxes and public fees were not evaluated in the DEIR. Subsection 4.12, *Public Services*, of the DEIR fully evaluates the Project's impacts to public services, including: fire protection, police protection, schools, parks, and other public facilities. The DEIR concluded that although the Project would result in an increase in demand for some public services, it would not necessitate the construction of new or expanded public facilities that could result in additional physical impacts that were not already addressed throughout the DEIR, and further concluded that implementation of the Project would not adversely affect service ratios, response times, or other performance objectives for the provision of public services. Accordingly, with mandatory payment of the City's development impact fees and school district fees, the Project would result in less-than-significant impacts related to public services. Additionally, the Project Applicant would be required to satisfy the City's development impact fee program requirements, which is intended to alleviate a project's financial impact to public service providers.

Based on the foregoing, the DEIR has fully evaluated the Project's impacts in the areas of aesthetics, biological resources, cultural resources, and public services, and the commenter has not introduced



substantial evidence that the analysis provided in the DEIR related to these environmental subjects was deficient. As such, no revision to the DEIR was necessitated by this comment.

M-8:

The DEIR accurately concluded that the Project site is not officially designated as a scenic vista by the City of Colton General Plan. The determination of the locations of scenic vistas was made using objective criteria based on the City of Colton's designation of scenic vistas within the City. While the commenter expresses opinions regarding the quality of the views at of the Project site, the DEIR properly relied on objective criteria in the evaluation of the potential for impacts to scenic vistas and the commenter did not introduce substantial evidence that the criteria used in this evaluation was deficient. Moreover, the DEIR discloses that the Project would permanently alter the existing hillside setting that characterizes the visual character of the Project site resulting in a significant impact to visual resources and that there are no feasible mitigation measures that would reduce the Project's impacts to the visual quality of the site to levels that are less than significant. Accordingly, although the DEIR found that the Project site does not constitute a scenic vista per the City of Colton General Plan, the impacts to the visual resources on the Project site that are the subject of the commenter's concerns were fully disclosed in the DEIR as a significant and unavoidable impact.

M-9:

Comments regarding the ecology of the hills and the well-being and heritage of the community are acknowledged and will be provided to City decision makers for their consideration.

M-10:

The City acknowledges the commenter's appreciation for the biological and cultural significance of the La Loma Hills region within which the Project site is located. As previously stated above in the City's response to comment M-7, the DEIR has fully evaluated the Project's impacts to biological and cultural resources in DEIR Subsections 4.3 and 4.4, respectively. With implementation of the required mitigation measures, the Project's impacts to biological resources and cultural resources would be reduced to levels below significance. The response to comment M-8 addresses concerns regarding impacts to visual resources. Therefore, no further analysis of these topics is required, and this comment does not warrant any revisions to the EIR.

The commenter accurately states that the Project's Cultural Resources Assessment (EIR *Technical Appendix F1*) identified 25 archaeological sites within the Project's study area. It should be noted that only 16 of the 25 archaeological sites that were identified are located within the Project's area of physical disturbances (refer to Figure 3-11, *Proposed Physical Disturbances*). The DEIR does not disclose the precise location of these archaeological sites, and confidential information has been redacted from EIR *Technical Appendix F1* for purposes of public review. The purpose of this redaction is to avoid or limit the potential that these archaeological sites would be placed at risk of being defaced or destroyed. Subsection 4.4, *Cultural Resources*, of the DEIR is based on the Cultural Resources Assessment (EIR *Technical Appendix F1*) that determined that only two (2) of the archaeological sites (Site SBR-29,034 and Site SBR-29,037) on the Project site are significant under CEQA Guidelines



§ 21083.2 and both resources are located outside of the development footprint of the proposed Project. The Project would be required to implement Mitigation Measure MM 4.4-1 to protect Site SBR-29,034 and Site SBR-29,037 during construction activities, and would implement Mitigation Measure MM 4.4-3 which would create easements to protect Site SBR-29,034 and Site SBR-29,037 throughout the operation of the Project. Mitigation Measure MM 4.4-2 would also require an archaeological monitor and Native American monitor to be present throughout grading activities to ensure that any inadvertent discoveries of potentially significant subsurface cultural resources (including tribal cultural resources) during ground disturbance activities do not result in the destruction of such resources. With implementation of mitigation, the Project's impacts to archaeological resources would be reduced to below a level of significance.

The City appreciates and acknowledges the commenter's extensive interpretation of the cultural and historical setting for the Project site and the surrounding communities. The purpose of Subsection 4.4, *Cultural Resources*, of the DEIR is intended to provide a summary of the paleontological, archeological, and historical background of the Project area and evaluate whether significant historical and cultural resources (pursuant to CEQA Guidelines) would be impacted by the Project; it is not the intent of the DEIR to provide a comprehensive history of the region and/or the Project area. The DEIR adequately evaluates the Project's impacts to historical, archaeological, and tribal cultural resources, and no revisions to the EIR are necessary in response to this comment. Nonetheless, the commenter's comment letter, including the narrative describing the cultural and historical setting for the Project site and surrounding communities, are included in the Final EIR and record of decision for the proposed Project.

M-11:

The City acknowledges the commenter's appreciation for the cultural significance of the La Loma Hills region within which the Project site is located. The purpose of Subsection 4.4, *Cultural Resources*, of the DEIR is intended to provide a summary of the paleontological, archeological, and historical background of the Project area and evaluate whether significant historical and cultural resources (pursuant to CEQA Guidelines) would be impacted by the Project; it is not the intent of the DEIR to provide a comprehensive history of the region and/or the Project area. The DEIR has fully evaluated the Project's impacts to cultural resources in DEIR Subsection 4.4. The DEIR's evaluation of the Project's impacts to cultural resources is based on the Cultural Resources Assessment (EIR *Technical Appendix F1*), and page 3.0-9 of the Cultural Resources Assessment (EIR *Technical Appendix F1*) provides a specific history of Roquet Ranch area. Furthermore, the commenter does not indicate how the addition of a detailed history of the region to the DEIR would affect the DEIR's conclusion that impacts to cultural resources would be reduced to less-than-significant levels with the implementation of the required mitigation measures. Therefore, this comment does not warrant any revisions to the EIR.

M-12:

The Trujillo Ditch (P1074-113/H) was identified in the Cultural Resources Assessment (EIR *Technical Appendix F1*) via the records search and discussed as an historic water transmission line that traverses



a portion of the Project's off-site improvement corridor. According to the DEIR and the Cultural Resources Assessment, the Trujillo Ditch was never formally recorded with the SBAIC nor could the feature be visually identified during the field survey performed as part of the Cultural Resources Assessment (BFSA, 2017a, p. 1.0-2). Therefore, the Trujillo Ditch was not identified as a significant historic resource. A specific history of Roquet Ranch is provided on page 3.0-9 of the Cultural Resources Assessment (EIR *Technical Appendix F1*). The Cultural Resources Assessment is not intended to provide an exhaustive history of the region, but rather to summarize the historical setting of the Project area and evaluate the historic significance of the land that would be physically impacted by the Project (refer to EIR Figure 3-11, *Proposed Physical Disturbances*). The "Agua Mansa Story" by Bruce Harley was utilized by Brian F. Smith and Associates, Inc. (preparer of the Cultural Resources Assessment) to assist in developing a general understanding of the historic setting of the Project, which is discussed in section 3.0 of the Cultural Resources Assessment. Since no information was specifically sourced from "Agua Mansa Story" by Bruce Harley in the text of the Cultural Resources Assessment, the source is not cited within the text. Based on the foregoing, this comment does not warrant any revisions to the DEIR.

M-13:

Please see responses to comments M-11 and M-12. The DEIR provides an adequate summary of the historical setting for the Project site and evaluation of the potential for impacts to historic resources. While the locations where a comprehensive history of the Project area can be located is acknowledged, the inclusion of a comprehensive historical background in the DEIR is unwarranted. Furthermore, and as disclosed in DEIR Subsection 4.4, *Cultural Resources*, of the DEIR, Project impacts to historical, archaeological, and tribal cultural resources would be reduced to less-than-significant levels with implementation of mitigation. No revision to the DEIR is warranted pursuant to this comment.

M-14:

The City acknowledges the additional topics suggested by the commenter. However, as previously stated in the City's responses to comments M-12 and M-13 above, the Cultural Resources Assessment (EIR *Technical Appendix F1*) is not intended to serve as an exhaustive history of the region, but rather evaluate the historic significance of the land that would be physically impacted by the Project (refer to EIR Figure 3-11, *Proposed Physical Disturbances*). Furthermore, it is unclear from this comment how the inclusion of an exhaustive description of the topics listed in this comment would affect the DEIR's conclusion that impacts to cultural resources would be less than significant following mitigation.

M-15:

The City appreciates and acknowledges the commenter's extensive interpretation of the cultural and historical setting for the Project site and the surrounding communities. The purpose of Subsection 4.4, *Cultural Resources*, of the DEIR is intended to provide a summary of the paleontological, archeological, and historical background of the Project area and evaluate whether significant historical and cultural resources (pursuant to CEQA Guidelines) would be impacted by the Project; it is not the intent of the DEIR to provide a comprehensive history of the region and/or the Project area. The DEIR adequately evaluates the Project's impacts to historical, archaeological, and tribal cultural resources,



and no revisions to the EIR are necessary in response to this comment. Nonetheless, the commenter's comment letter, including the narrative describing the cultural and historical setting for the Project site and surrounding communities, are included in the Final EIR and record of decision for the proposed Project. Accordingly, no revision to the DEIR is warranted pursuant to this comment.

M-16:

Please see response to comment M-13, above. While the DEIR does not contain a comprehensive historical setting for the Project area, the DEIR includes a thorough evaluation of the physical impacts of the Project on historical resources. The commenter does not introduce substantial evidence that potentially significant historic resources occur on the Project site or that the Project would otherwise result in potentially significant impacts to historical resources.

M-17:

The DEIR was circulated for a 45-day public review period between August 7, 2017 and September 21, 2017. The length of the DEIR public review period (45 days) adhered to the 45-day public review period required for EIRs that are submitted to the State Clearinghouse for review, pursuant to CEQA Guidelines § 15105 and § 21091(a). City staff was not made aware of any issues accessing the webpage where the DEIR was made available online, as noted in the Notice of Availability (NOA) for the Project. Furthermore, the CEQA statutes or guidelines do not require making NOAs or DEIRs available online. Additionally, in accordance with CEQA Guidelines § 15087(a), the City provided the DEIR and NOA to all organizations and individuals who have previously requested such notice in writing prior to the commencement of the 45-day public review period for the DEIR. The City directly mailed the NOA to owners and occupants of properties located within a 1,000-foot radius of the Project site prior to the commencement of the 45-day public review period. An electronic copy of the DEIR was available for download using the hyperlink provided in the NOA for the full 45-day public review period. Hard copies of the DEIR with reference documents and technical appendices on CD were made for the public to review at the following locations for the full 45-day public review period:

- City of Colton Planning Division, located at 659 N. La Cadena Drive Colton, CA;
- Colton Public Library (main branch), located at 656 North 9th Street, Colton, CA;
- Colton Public Library (Luque Branch), located at 294 East "O" Street, Colton, CA; and
- Colton City Clerk Office, located at 650 N. La Cadena Drive, Colton, CA.

Based on the foregoing, the public review period provided for the DEIR fully adhered to the applicable requirements established in § 15105, § 15087, and § 21091 of the CEQA Guidelines.

M-18:

The City acknowledges the commenter's concerns regarding the sequencing of the proposed Project with the development and approval of the Northside Specific Plan. The Roquet Ranch Specific Plan and the Northside Specific Plan are two distinct projects that would occur on separate properties. The purpose of the Roquet Ranch EIR is to evaluate the physical environmental impacts that would result from implementation of the proposed Roquet Ranch Specific Plan. At the time that the Notice of Preparation was filed and the DEIR was prepared, applications for the Northside Specific Plan had not



yet been filed. Although the City of Riverside is undergoing a public workshop process to assess the community's desires with regard to the potential land uses which may be planned within the Northside SP boundary, the development of the SP has not reached a point where the specific land uses have been identified or stabilized for evaluation. Accordingly, because the land use plan associated with the Northside SP has not been identified, any evaluation of the development of the Northside SP would not be reasonable or practical as it would be highly speculative. This comment does not identify address any specific deficiency within the DEIR, and therefore does not necessitate any further analysis or revisions in the DEIR.

M-19:

The City acknowledges the commenter's objection to the Project. The City's decisionmakers will ultimately consider comments regarding the merits of the proposed Project during public hearings.

M-20:

The City acknowledges the undersigned parties for their review of the DEIR and provision of comments, as well as the availability of additional references.



LETTER N (Page 1 of 1)

From: Alexander King [<mailto:avking@live.com>]
Sent: Thursday, September 21, 2017 4:58 PM
To: msuarez@coltonca.gov; mtomich@coltonca.gov; Shawn Nevill <sneville@tbplanning.com>
Subject: RE: ROQUET RANCH PROJECT DRAFT EIR SCH No. 2016061056

Gentlemen,

I see little to no reference to the cultural resources extant on an nearby the west face of La Loma in the EIR or the supporting documents.

For example, the historic Trujillo Ditch--both the 1845 ditch and the re-built post-1862 ditch--are not referenced at all even though it ran along the western most edge of the proposed project's property. (The Trujillo Ditch was later acquired and incorporated into the Riverside Water Company's "Lower Riverside Ditch".)

←
N-1
←

Neither is their any mention of the impact to or mitigation of the proposed widening and increased traffic on Old Pellissier Road/N. Orange Drive less than 200 feet from the historic Trujillo Adobe.

←
N-2
←

The EIR should not be accepted until such 19th century cultural resources are thoroughly evaluated, mitigation proposed, and mentioned in the document.

--Alex. King
h: 310-397-8900
VoIP: 310-424-9500 (please leave a voice message)

Director-at-large
Old Spanish Trail Association
www.oldspanishtrail.org

←
N-3
←



Old Spanish Trail Association – Comment Letter N

N-1:

The Cultural Resources Assessment (EIR *Technical Appendix F1*) surveyed the entire 336.2-acre Project site and the proposed off-site improvement areas for historical and archaeological resources. Additionally, the Cultural Resources Assessment included a records search conducted by the San Bernardino Archaeological Information Center (SBAIC) at the San Bernardino County Museum (SBCM) that included a one-mile buffer around the project in order to determine the presence of any previously recorded sites within and around APE. Therefore, the Cultural Resources Assessment and DEIR fully evaluated the Project's impacts to all previously recorded archaeological and historical records on-site and within one-mile of the Project site, as well as any archaeological and historical resources that were identified during the field survey. The SBAIC also provided the standard review of the National Register of Historic Places (NRHP) and the Office of Historic Preservation (OHP) Historic Property Directory. Land patent records, held by the Bureau of Land Management (BLM) and accessible through the BLM General Land Office (GLO) website, were also reviewed for information pertinent to the Project. In addition, the research library of the consulting archaeologist, Brian F. Smith and Associates, Inc. (BFS), was consulted for any relevant historical information. The Project's impacts to any historical resources that were disclosed in the DEIR.

As concluded in the Cultural Resources Assessment performed for the Project (EIR *Technical Appendix F1*), although the Trujillo Ditch and the Riverside canals are considered potentially significant resources, the survey of the Project site and off-site improvement corridors did not result in the identification of any remnants of any of the historic waterways. Therefore, no remaining portions of the alignments would be directly impacted by the Project. The following is provided for informational purposes with respect to the Trujillo Ditch, and does not warrant any revisions to the DEIR or the Cultural Resources Assessment prepared for the Project (EIR *Technical Appendix F1*).

The historic Trujillo Ditch is included in the cultural resources assessment as Site SBR-7172/H. The ditch was recorded in 1992 by Robert Wlodarski as an earthen and cement ditch. Additional information about the Trujillo Ditch and the community it serviced is provided herein. Although the information provided below contains additional detail regarding potential historical resources at the Project site, none of the information provided below constitutes "significant new information" that would affect the DEIR's conclusion that impacts to cultural resources would be less than significant following mitigation.

The Project site is located to the east of the former community of La Placita de los Trujillos, also known as San Salvador. While this is a known historic settlement, the townsite itself is not a recorded archaeological site recognized by the local information centers, and therefore, has not been assigned a site number. However, historic research indicates that in the 1840s, a group of Genízaros (displaced hispanicized Indians) from New Mexico, led by Lorenzo Trujillo, established the community of La Placita de los Trujillos on the southeastern side of the Santa Ana River and the community of Agua



Mansa on the northwestern side of the river¹². Don Juan Bandini, to whom the Mexican government had granted Rancho Jurupa in 1838, donated the land, which encompassed both settlements, to the Genízaros on the condition that they would assist in protecting livestock from Indian raids.

During the establishment of the La Placita de los Trujillos community, an extensive irrigation system was developed, which included the Trujillo Ditch. The water conveyance system serviced the farms, orchards, and vineyards of the new community. In the areas located to the southeast of what is now the city of Riverside, livestock was grazed on a mesa pasture. In 1852, the Board of Supervisors of Los Angeles County established the town of San Salvador, which encompassed Jurupa, Agua Mansa, La Placita de los Trujillos, and other adjacent settlements. During this time, Trujillo's house (the Trujillo Adobe) was established as the official location for elections¹³. The town of San Salvador and most of its structures were destroyed in 1861 and 1862 as a result of massive flooding¹⁴. Although the inhabitants quickly rebuilt after the floods, the rich soil that was once present had been washed away, leaving heavy sand deposits. As a result, many residents relocated to the mesa north of the Santa Ana River, while some moved to the southeast bank.

After the town of Riverside was founded in 1870, work began on the Riverside Upper Canal. The northern portion of the canal, which extended from the Santa Ana River to a quarter-mile below the town of Riverside, running along the eastern boundary of La Placita de los Trujillos, was completed in early July of 1871. The canal served 30 to 40 families in Riverside. The canal was described as being "very crooked," but was widened and straightened in various locations between 1871 and 1874 in an attempt to increase the amount of water flowing to the town of Riverside below.¹⁵

In 1875, the workers building the Riverside Lower Canal discovered that the Trujillo Ditch was located within the alignment they were trying to use. The owners of the Trujillo Ditch water claim allowed the new Riverside canal to take the place of theirs under the agreement that the Trujillos would take their water from the canal at a lower point to the southwest of the final alignment¹⁵. An 1888 irrigation map of the region (see Figure 1 prepared by Brian F. Smith and Associates which is included as Attachment C) shows the land that Bandini donated (labeled as "The Bandini Donation") and the alignments of the Trujillo Ditch, the Riverside Upper Canal, and the Riverside Lower Canal, all of which are located outside of the western Project site boundary.

¹² Gunther, Jane Davies, 1984. *Riverside County, California, Place Names: Their Origins and Their Stories*. Ruidoux Printing, Riverside, California.

¹³ City of Riverside, 2015. Historic Property Results: 195 Orange Street. Electronic document: <http://www.sbcounty.gov/museum/branches/agua.htm>. Accessed August 21, 2017.

¹⁴ County of San Bernardino, 2017. The Agua Mansa Pioneer Cemetery. Electronic document: <http://www.sbcounty.gov/museum/branches/agua.htm>. Accessed August 21, 2017.

¹⁵ Hall, W.M. Ham., 1888. *Irrigation in California (Southern): The Field, Water-Supply, and Works, Organization and Operation in San Diego, San Bernardino, and Los Angeles Counties*. The Second Part of the Report of the State Engineer of California on Irrigation and the Irrigation Question. Sacramento: State Office, J.D. Young, Supt. State Printing, Sacramento, California.



N-2:

The Trujillo Adobe is surrounded by existing industrial development, and would not be directly or indirectly impacted by the Project, including improvements to the intersection of Old Pellissier Road and N. Orange Drive. While the Project would contribute traffic to this intersection, an increase in traffic would have no impact on the Trujillo Adobe. No revisions to the DEIR are necessary with respect to this comment.

N-3:

As discussed in the City's response to comment N-1, the Cultural Resources Assessment fully evaluated the Project's potential impacts to historic resources. No significant historic resources were identified within the Project's development footprint (including the Trujillo Ditch); therefore, the Project's impact on historic resources would be less than significant, and no mitigation would be required. This comment does not describe or identify any cultural resources that would be affected by the Project beyond what is already evaluated and disclosed by the EIR. No revisions to the DEIR are necessary with respect to this comment.



LETTER O (Page 1 of 1)



OLD SPANISH TRAIL
ASSOCIATION

Old Spanish National Historic Trail – October 10, 2006

September 20, 2017

Mr. Mario Suarez, Senior Planner
City of Colton Planning Department
659 North La Cadena Drive
Colton, CA 92324

RE: ROQUET RANCH PROJECT – DRAFT CEQA REPORT, SCH #2016061056

Dear Mr. Suarez:

As President for the Agua Mansa Chapter- Old Spanish Trail Association (AM-OSTA), I am writing to express our concerns with the lack of a complete acknowledgement of historic places and trail within the Draft CEQA report for the proposed Roquet Ranch Project.

O-1

The Aqua Mansa Chapter for the Old Spanish Trail Association is focused on the preservation of the Old Spanish National Historic Trail (OSNHT) routes within San Bernardino and Riverside Counties from the Cajon Pass to the City of Pomona. The Old Spanish Trail Association (OSTA) specifically promotes public awareness of the OSNHT and its multicultural heritage by encouraging research and publication and partnering with governments and private organizations.

O-2

For your reference, please read the Bureau of Land Management/National Park Service "Draft" CAS of October, 2016, which provides a quick review of the following references related to the OST routes within the scope of the proposed Roquet Ranch project:

- The listing of Politana, Agua Mansa, and the Trujillo Adobe as high potential sites of the OSNHT ("Table 2 High Potential Sites", p. 21);

- What appears to be a proposed realignment of the OSNHT (a continual section - north to south and then west) through the Politana and Agua Mansa areas ("Map 5a Old Spanish Trail High Potential Sites and Segments - California" p.29);

O-3

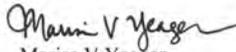
- A section on Agua Mansa as a hispanic community/settlement "resource" of the OSNHT ("Chapter 3 - Resources of the Old Spanish National Historic Trail - Hispano Communities", p. 88-90, and sub-sections on "Communities . . .," "Churches," "Cemeteries," and "Ranches" at pp. 104-105).

The Aqua Mansa Chapter respectfully requests that this CEQA document acknowledge the existence of the OST within the Roquet Ranch Project scope and ensure appropriate preservation of the documented routes (signage and trail designation pathways) as part of any design within the approved project development plan.

O-4

Thank you for your attention to our request and we look forward to hearing from you.

Sincerely,


Marisa V Yeager
President, Agua Mansa Chapter
Old Spanish Trail Association

O-5

Agua Mansa Chapter-Old Spanish Trails Association, 3643 University Ave, Suite 1, Riverside, CA 92501



Old Spanish Trail Association, Agua Mansa Chapter – Comment Letter O

O-1:

The City acknowledges the concerns expressed by the Old Spanish Trail Association, Agua Mansa Chapter regarding potential impacts to historic places and trails. Please refer to the responses below to the individual concerns expressed by this letter.

O-2:

The City acknowledges the mission of the Old Spanish Trail Association. No revisions to the DEIR are warranted with respect to this comment.

O-3:

The City acknowledges that the National Park Service (NPS) has identified Politana, Agua Mansa, and the Trujillo Adobe as high potential sites for trails. According to Section 12 of the National Trails System Act:

High potential sites are those historic sites related to the route or sites in close proximity thereto, which provide opportunity to interpret the historic significance of the trail during the period of its major use; criteria for consideration as high potential sites include historic significance, presence of visible historic remnants, scenic quality, and relative freedom from intrusion.¹⁶

Although identified as being high potential sites by the NPS, Politana, Agua Mansa, and the Trujillo Adobe are all located outside the Roquet Ranch Project physical disturbance areas and would not be impacted by the proposed Project. In addition, although Politana, Agua Mansa, and the Trujillo Adobe meet the National Trails System Act's definition of high potential sites, that does not mean that they have been evaluated, or listed, as significant resources under National Register of Historic Places criteria.

Additionally, although the exact location of the original trail is currently unknown, the NPS (2016) maps the trail along the present location of Agua Mansa Road, which is located approximately 1,500 feet northwest of the western Project site boundary. As no remnants of the trail were observed on the Project site or within the off-site improvement areas during the cultural resources survey (EIR *Technical Appendix F1*), it is not expected that the Project would have any impact on the any remnant portions of the trail.

Based on the foregoing, no revisions to the DEIR are warranted with respect to this comment.

¹⁶ U.S. Department of the Interior, National Park Service, 2016. Old Spanish National Historic Trail Final Comprehensive Administrative Strategy, 20.



O-4:

As discussed in the City's response to comment O-3 above, there is no evidence to indicate that any segment of the Old Spanish Trail alignment occurs on the Project site or within the Project's proposed off-site improvement areas. Therefore, the Project would not conflict with any preservation efforts of any remnant portions of the Old Spanish Trail. Additionally, since the 2016 NPS maps depict the trail along the existing location of Agua Mansa Road (approximately 1,500 feet northwest of the western Project site boundary), there is no need for the Project to be designed to incorporate signage or trail designation pathways with respect to the Old Spanish Trail. Based on the foregoing, no revisions to the DEIR are necessary with respect to this comment.

O-5:

The City acknowledges the Old Spanish Trail Association, Agua Mansa Chapter for providing comments on the DEIR.



LETTER P (Page 1 of 3)



www.oldsouthtrail.org

PRESIDENT:

Ashley Hall
 4651 White Rock Drive
 Las Vegas, NV 89121
ashleyhall@cox.net

VICE-PRESIDENT:

Reba Wells Grandrud
 2322 E. Cholla St.
 Phoenix, AZ 85028-1709
rggrandrud@cox.net

SECRETARY:

Paul Ostapuk
 PO Box 3532
 Page, AZ 86040
postapuk@gmail.com

TREASURER:

Gary Boyd
 1540 W. Warm Springs, Ste. 100
 Henderson, NV 89014
gary@bovdcpa.com

DIRECTORS:

Earl Fosdick - AZ
 4046 E. Dynamite
 Cave Creek, AZ 85331
ekfosdick@netzero.com

Nancy Melendez - CA
 9216 Hawthorne Ave.
 Riverside, CA 92503
nancymelendez@mc.com

Vicki Felmlee - CO
 178 Glory View Drive
 Grand Junction, CO 81503
vicki@americamoreless.com

Vacant - NM

Robert Spurlock - NV
 HC 37 Box 610
 Sandy Valley, NV 89019
treeboar711@gmail.com

Stephanie Moulton - UT
 2 North SR 25
 Fish Lake, UT 84744
fishlake@scinternet.net

Director at Large
 Alexander King
 3716 Coolidge Ave.
 Los Angeles, CA 90066-3312
avking@live.com

Director at Large - NA
 Dr. James Jefferson
 3258 Hwy 172
 Durango, CO 81302
jj1492@q.com

***** ELECTRONIC TRANSMISSION ONLY *****

Re: Roquet Ranch Specific Plan – EIR – City of Colton

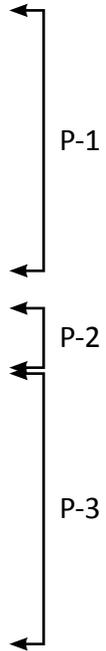
September 21, 2017

Mr. Mario Saurez
msuarez@coltonca.gov

Dear Mr. Saurez:

I am writing to you at this time as Association Manager of the Old Spanish Trail Association (OSTA), a IRS Section 501(c)(3) non-profit organization founded for the purpose of research, promotion, education, planning, and management assistance for the Old Spanish National Historic Trail (OSNHT), designated by Congress and the President of the United States in 2002 (Public Law 107-325, 116 Stat. 2790) and administered under the National Trails System Act (16 U.S.C. §§1241, et. seq.). The OSNHT is federally co-administered by the Bureau of Land Management (BLM) and the National Park Service (NPS), both of which OSTA works closely with in consultation regarding the Trail.

We have recently become aware of the Roquet Ranch development proposal in the City of Colton. Unfortunately, we have not had adequate time to review the City's Environmental Impact Report (EIR) in its entirety. As we understand it the development is intended to take place on privately held lands. Consequently, the outright protective mandates of the NTSA applicable to federal lands do not necessarily apply to this project. Nevertheless, the acknowledgement of the OSNHT in the project area by the federal Co-Administrators of the Trail, expresses not only the local, but national cultural heritage value of this historic route of travel and related sites. We advocate that the City of Colton and responsible California and local government authorities pay particular attention to these resources in planning and environmental review efforts related to the proposed development.



John W. Hiscock, Association Manager P.O Box 324 Kanab, UT 84741
 Phone: 435-689-1620 E-Mail: ostamgr@gmail.com



LETTER P (Page 2 of 3)

National Historic Trails are administered pursuant to management plans developed by the federal Co-Administrators with authority for each Trail. In the case of the OSNHT, such a draft management plan, titled "Old Spanish National Historic Trail Final [sic] Comprehensive Administrative Strategy" (CAS) was released for public review in August 2016 by the BLM and NPS. The draft CAS is currently being finalized by the BLM and NPS. The CAS can be referenced at:

<https://parkplanning.nps.gov/document.cfm?parkID=454&projectID=12591&documentID=74062>.

Importantly to the current project and analysis of environmental impacts is the fact that in the CAS, the federal Co-Administrators of the Trail, identified OSNHT routing and sites in the project area. The CAS identifies the following OSNHT routing and "high potential historic sites" in the project vicinity:

- The listing of Politana, Agua Mansa, and the Trujillo Adobe as high potential sites of the OSNHT ("Table 2 High Potential Sites", p. 21);
- A proposed realignment of the OSNHT (a continual section - north to south and then west) through the Politana and Agua Mansa areas ("Map 5a Old Spanish Trail High Potential Sites and Segments - California" p.29);
- A section on Agua Mansa as a Hispanic community/settlement "resource" of the OSNHT ("Chapter 3 - Resources of the Old Spanish National Historic Trail - Hispano Communities", p. 88-90, and sub-sections on "Communities . . .", "Churches," "Cemeteries," and "Ranches" on related cultural resources at pp. 104-105).

It is our understanding that the Roquet Ranch EIR fails to recognize or analyze the impact of the noted project on the suggested rerouting of the OSNHT, or the related historic sites and resources outlined in the CAS. We request that the City of Colton revise its project analysis to take the existence of the OSNHT and related resources into account. At the very least project development planning should evaluate mitigation actions in the area of said Trail routing and sites to protect the Trail corridor and archeological resources related to the Trail, as well as opportunities for public recreation and education related to such.

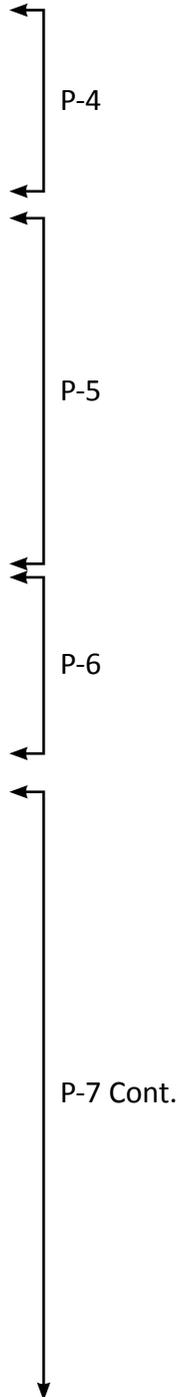
We appreciate your attention and consideration of our comments in this regard. If we can be of further assistance, please don't hesitate to contact us.

Sincerely,

John W. Hiscock
Association Manager



John W. Hiscock, Association Manager P.O Box 324 Kanab, UT 84741
Phone: 435-689-1620 E-Mail: ostamgr@gmail.com





LETTER P (Page 3 of 3)

P-7 Cont.



*John W. Hiscock, Association Manager P.O Box 324 Kanab, UT 84741
Phone: 435-689-1620 E-Mail: ostamgr@gmail.com*



Old Spanish Trail Association, National Chapter – Comment Letter P

P-1:

The City acknowledges description and mission the Old Spanish Trail Association (OSTA), National Chapter.

P-2:

The DEIR was circulated for a 45-day public review period between August 7, 2017 and September 21, 2017. The length of the DEIR public review period (45 days) adhered to the 45-day public review period required for EIRs that are submitted to the State Clearinghouse for review, pursuant to CEQA Guidelines § 15105 and § 21091(a). Additionally, in accordance with CEQA Guidelines § 15087(a), the City provided the DEIR and NOA to all organizations and individuals who have previously requested such notice in writing prior to the commencement of the 45-day public review period for the DEIR. An electronic copy of the DEIR was available for download using the hyperlink provided in the NOA for the full 45-day public review period. Hard copies of the DEIR with reference documents and technical appendices on CD were made for the public to review at the following locations for the full 45-day public review period:

- City of Colton Planning Division, located at 659 N. La Cadena Drive Colton, CA;
- Colton Public Library (main branch), located at 656 North 9th Street, Colton, CA;
- Colton Public Library (Luque Branch), located at 294 East “O” Street, Colton, CA; and
- Colton City Clerk Office, located at 650 N. La Cadena Drive, Colton, CA.

Based on the foregoing, the public review period provided for the DEIR fully adhered to the applicable requirements established in § 15105, § 15087, and § 21091 of the CEQA Guidelines.

P-3:

The Cultural Resources Assessment (EIR *Technical Appendix F1*) and EIR Subsection 4.4, *Cultural Resources*, fully evaluated the Project’s impacts to historic resources and did not identify any portion of the Old Spanish National Historic Trail (OSNHT) alignment within the Project’s proposed physical disturbances area (depicted on Figure 3-11, *Proposed Physical Disturbances*). Therefore, the Project would have no potential to impact the OSNHT. Notwithstanding, the City appreciates the concerns of the OSTA with respect to the OSNHT, and will consider these resources in the planning and environmental review efforts of future planning efforts that may have an adverse effect on the OSNHT.

P-4:

The City acknowledges the commenter’s reference to the draft “Old Spanish National Historic Trail Final Comprehensive Administrative Strategy (CAS)” developed by the Bureau of Land Management and National Parks Service. However, the CAS is not applicable to the proposed Project. Accordingly, no revision to the DEIR is warranted pursuant to this comment.



P-5:

The City acknowledges that the National Park Service (NPS) has identified Politana, Agua Mansa, and the Trujillo Adobe as high potential sites for trails. According to Section 12 of the National Trails System Act:

High potential sites are those historic sites related to the route or sites in close proximity thereto, which provide opportunity to interpret the historic significance of the trail during the period of its major use; criteria for consideration as high potential sites include historic significance, presence of visible historic remnants, scenic quality, and relative freedom from intrusion.¹⁷

Although identified as being high potential sites by the NPS, Politana, Agua Mansa, and the Trujillo Adobe are all located outside the Roquet Ranch Project physical disturbance areas and would not be impacted by the proposed Project. In addition, although Politana, Agua Mansa, and the Trujillo Adobe meet the National Trails System Act's definition of high potential sites, that does not mean that they have been evaluated, or listed, as significant resources under National Register of Historic Places criteria.

Additionally, although the exact location of the original trail is currently unknown, the NPS (2016) maps the trail along the present location of Agua Mansa Road, which is located approximately 1,500 feet northwest of the western Project site boundary. As no remnants of the trail were observed on the Project site or within the off-site improvement areas during the cultural resources survey (EIR *Technical Appendix F1*), it is not expected that the Project would have any impact on the any remnant portions of the trail.

Based on the foregoing, no revisions to the DEIR are warranted with respect to this comment.

P-6:

Please see response to comment P-5. As indicated in that response, the Project would not result in any adverse effects to the OSNHT or related historic sites and resources outlined in the CAS. As such, mitigation measures for impacts to the OSNHT are not necessary, as no such impacts would occur. No revision to the DEIR is warranted pursuant to this comment.

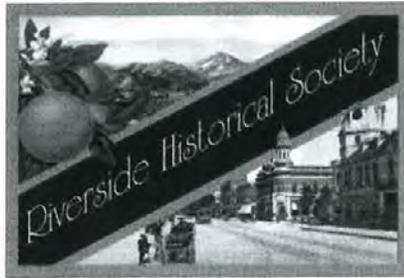
P-7:

The City acknowledges the Old Spanish Trail Association, National Chapter for providing comments on the DEIR.

¹⁷ U.S. Department of the Interior, National Park Service, 2016. Old Spanish National Historic Trail Final Comprehensive Administrative Strategy, 20.



LETTER Q (Page 1 of 2)



Riverside Historical Society
P. O. Box 246
Riverside, CA 92502
www.riversidehistoricalsociety.org
riversidehistoricalsociety@gmail.com

September 14, 2017

Mr. Mario Suarez, Senior Planner
City of Colton, California
650 N. La Cadena Drive
Colton, CA 92324

RE: Roquet Ranch Specific Plan Cultural Impacts

Dear Mr. Suarez,

The Riverside Historical Society has reviewed the draft EIR for the Roquet Ranch Specific Plan and has the following comments to make:

The western boundary of the project site is perilously close to the original earthen alignments of both the Riverside Upper Canal and Riverside Lower Canal, dating from 1871 and 1875 respectively (see attached photos of these alignments). These remnants appear now as broken yet very delineable features in the landscape between North Orange Street and the Santa Ana River to the north. In the case of the Riverside Lower Canal, these remnants are the ONLY surviving pieces of that canal.

In reviewing the Draft EIR, we find no mention of these canal alignments at all. We do not know whether this was an oversight or if the canal alignments are not actually on the Roquet Ranch property.

Regardless of where the alignments lie, it appears that they may be in danger of significant impacts from grading and other development activities as a part of this proposal. Therefore, the Riverside Historical Society requests the following:

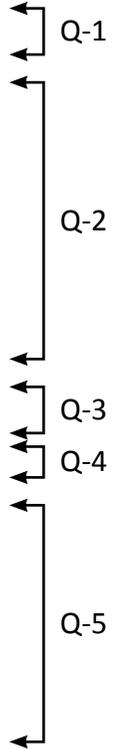
1. Steps must be taken to delineate the original earthen alignments of the Riverside Upper and Lower Canals as they correspond to the extent of development of the Roquet Ranch.
2. During grading activities, a historical archaeologist must be present to ensure that the original alignments are protected from project impacts.

Thank you for the opportunity to comment on this proposal. If you have any questions regarding our comments, please don't hesitate to contact us at riversidehistoricalsociety@gmail.com.

Sincerely,

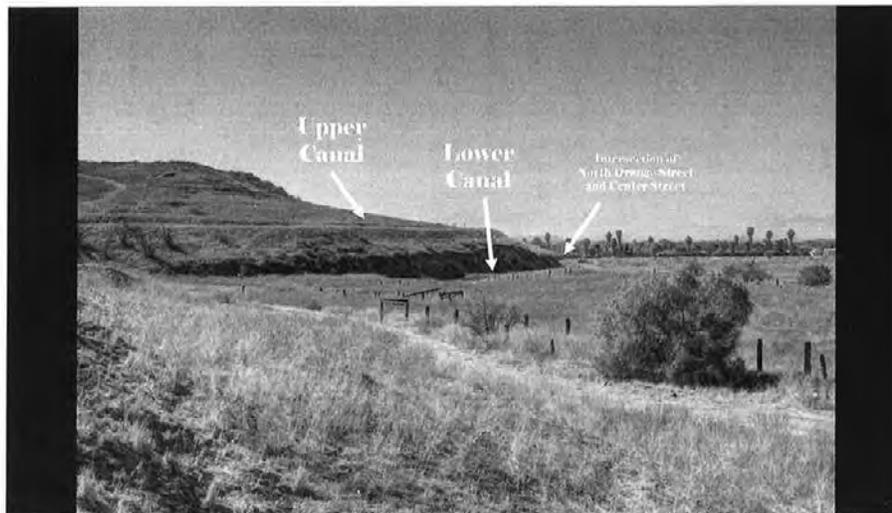
Steve Lech, President
Riverside Historical Society

(Enc)





LETTER Q (Page 2 of 2)



Q-6



Riverside Historical Society – Comment Letter Q

Q-1:

The City acknowledges and appreciates the comments from the Riverside Historical Society, which are addressed in the comment responses below.

Q-2:

The Cultural Resources Assessment (EIR *Technical Appendix F1*) surveyed the entire 336.2-acre Project site and the proposed off-site improvement areas for historical and archaeological resources. Additionally, the Cultural Resources Assessment included a records search conducted by the San Bernardino Archaeological Information Center (SBAIC) at the San Bernardino County Museum (SBCM) that included a one-mile buffer around the project in order to determine the presence of any previously recorded sites within and around the Area of Potential Effect (APE). The SBAIC also provided the standard review of the National Register of Historic Places (NRHP) and the Office of Historic Preservation (OHP) Historic Property Directory. Land patent records, held by the Bureau of Land Management (BLM) and accessible through the BLM General Land Office (GLO) website, were also reviewed for information pertinent to the Project. In addition, the research library of the consulting archaeologist, Brian F. Smith and Associates, Inc. (BFSA), was consulted for any relevant historical information. As concluded in the Cultural Resources Assessment, although the Trujillo Ditch and the Riverside Canals are considered potentially significant resources, the survey of the Project site and off-site improvement corridors did not result in the identification of any remnants of any of the historic waterways. Therefore, no remaining portions of the alignments would be directly or indirectly impacted by the Project. Please refer also to the response to comment N-1, which provides additional discussion of the regions historical context, including the Trujillo Ditch and the Riverside canals.

Q-3:

Please see the response to comment Q-2. As indicated in that response, although the Trujillo Ditch and the Riverside canals are considered potentially significant resources, the survey of the Project site and off-site improvement corridors by the Project's archaeologist did not result in the identification of any remnants of the Riverside Canals. Because the canals do not occur within the Project's potential impact footprint, delineation of the original earthen alignments of the Riverside Upper and Lower Canals is not necessary to demonstrate that impacts to these features would not occur. Accordingly, no revision to the DEIR is warranted pursuant to this comment.

Q-4:

Subsection 4.4, *Cultural Resources*, of the DEIR is based on the Cultural Resources Assessment (EIR *Technical Appendix F1*). The Cultural Resources Assessment of the Project site and the proposed off-site improvement corridors did not identify any remnants of the historic waterways that could be directly or indirectly impacted by Project development. Nonetheless, DEIR Mitigation Measure MM 4.4-2 would require an archaeological monitor and Native American monitor to be present throughout grading activities to ensure that any inadvertent discoveries of potentially significant subsurface cultural resources (including historical resources) during ground disturbance activities do not result in



the destruction of such resources. With implementation of mitigation, the Project's impacts to archaeological resources would be reduced to below a level of significance.

Q-5:

The City of Colton acknowledges the contact information, and will reach out to the commenter with any further questions.

Q-6:

The acknowledges the reference photos that were provided as attachments. Please see response to comments Q-2 through Q-4 regarding the potential to impact historic water conveyance facilities.

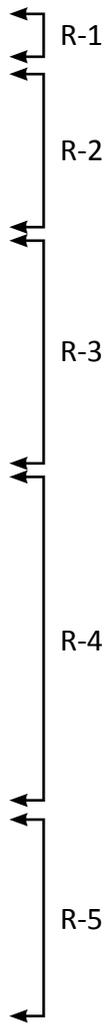


LETTER R (Page 1 of 5)

Administrative Draft Environmental Impact Report
Roquet Ranch Specific Plan, City of Colton, California
SCH No. 2016061056
Public Review Draft
August 2, 2017

San Manuel Band of Mission Indians (SMBMI) Comments
September 15, 2017

- SMBMI reaffirms the on-going consultation efforts with the City of Colton, Planning Department, pertaining to the aforementioned proposed project.
- Section: 4.4 Cultural Resources, Summary of Impacts; Mitigation Measures (MM)
 - Page S-29 MM 4.4-2
Under #1 – ADD to read as *Written verification that a certified archaeologist(s), defined as meeting the Secretary of the Interior’s Standards for professional archaeology (U.S. Department of the Interior, 2011) has been retained. . . .letter from the project archaeologist to the City of Colton.*
 - Page S-29 MM 4.4-2
Under #2, 3, 4, – ADD to read as *Native American monitor(s)* throughout the MM’s. Under #2 - Add to read as *archaeological monitor(s)* throughout the MM’s. (In the event, ground disturbing activities are in operation simultaneously, the archaeological monitor(s) and Native American monitor(s) will be assigned to appropriately monitor those areas of activities, especially when inadvertent discovery occurs and/or human remains/cremations are discovered)
 - Page S-29 MM 4.4-2
ADD: An Archaeological Monitoring Plan, A Discovery and Treatment Plan must be developed; as these are separate Plans, instead of *Archeological Monitoring Program and Data Recovery Protocol*. (Please see SMBMI CEQA-AB521 language template, of which has been readily adopted and implemented by these agencies: County of San Bernardino, County of Kern, City of Loma Linda, City of Rancho Cucamonga, and the City of Redlands. The language template provides for clear guidance in avoidance and protection of the cultural resources. Ground disturbing activities include (i.e. grubbing, tree removal, vegetation clearing, demolition, conventional mass grading, trenching, potholing, excavation, planting, geotechnical investigations, and ground surface leveling, etc.)
 - Page S-30 MM 4.4-2
The sentence starting with: *For significant cultural resources, a Research Design and Data Recovery.....City of Colton Building Official or their designee before being carried out using professional archaeological methods.* ADD: The City of Colton shall consult with the appropriate consulting Tribe(s), in determining appropriate treatment for unearthed cultural resources if the resources are prehistoric or Native American in nature.





LETTER R (Page 2 of 5)

- Page S-30 MM 4.4-2
A new numerical element introduces this: *If any human bones (change to human remains and/or cremations) are discovered...determine proper treatment and disposition of the remains.* This numeric element must be a stand-alone; as it addresses human remains.
 - Page S-30 MM 4.4-2
The paragraph beginning with *Before construction activities are allowed to resume.....amount of material to be recovered for an adequate artifact sample for analysis,* a treatment plan(s) shall be developed and reviewed in consultation with the consulting Tribe(s). [SMBMI has worked with agencies and developers and their consultants (Environmental and CRM firms) to assist with the development of such treatment plans.]
 - Page S-31 MM 4.4-3
Request clarification on this mitigation measure. Who is the 501c Tribal entity that will be responsible for overseeing the protection of the cultural resources in perpetuity?
 - Page S-32 Threshold e) SMBMI did inform the City of Colton on Thursday, August 18, 2016, via email from Leslie Mouriquand to Mario Suarez pertaining to the proposed project location, which is within the Tribe’s ancestral territory and the Santa Ana River and nearby hills are considered sensitive for tribal cultural resources. Subsequent to this initial notification, a conference call was held on Thursday, April 13, 2017 with Mario Suarez and Mr. Shawn Nevill, TB Planning to discuss the Tribes concerns pertaining to the impacts on the cultural resources; as a follow-up the cultural resource reports were requested by Tribe and the draft mitigation measures. On Wednesday, July 26, 2017 Mario Suarez, City of Colton Planning Manager sent an email, identifying consultation closed, with a reply back from Ann Brierty, SMBMI, Cultural Resources Specialist indicted that *this project was not completed,* consultation was not completed. The public DEIR was released and Mario Suarez forwarded the report.
- SMBMI is requesting a conference call during the week of September 25, to properly discuss the draft mitigation measures the City of Colton has developed and the Tribes preferred language.
 - SMBMI is requesting an on-site visit to the proposed project during the week of September 25, with the City of Colton, developer and CRM firm.
 - SMBMI commends the City of Colton and developer for creating an “open space” for eight (8) of the archaeological sites.
 - SMBMI references that in the City of Colton, General Plans the Cultural Resources Element: Goal #1, Policy 1a, Goal #2, Policy 2f , which implements measures designed to protect and maintain the City’s historic resources, which are also important to the Tribe.





LETTER R (Page 3 of 5)

The following language is preferred by SMBMI because it is 1) more complete, 2) provides information on how to proceed in many circumstances, and 3) protects the interests of all parties.

CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

I. If an archaeological deposit or tribal cultural resource is discovered within the project area, ground disturbing activities (i.e. grubbing, tree removal, vegetation clearing, demolition, conventional mass grading, trenching, potholing, excavation, planting, geotechnical investigations, and ground surface leveling, etc.) shall be suspended 60 feet around the resource(s) and an Environmentally Sensitive Area (ESA) physical demarcation/barrier constructed. Representatives from both San Manuel Band of Mission Indians (SMBMI) and other consulting tribes, the applicant/developer, and the City of _____ Planning Department shall confer regarding treatment of the discovered resource(s). A treatment plan shall be prepared, reviewed and adopted by all Parties, and then implemented to protect the identified resources from damage and destruction. The treatment plan shall contain a research design to evaluate the resource for significance under both NHPA and CEQA criteria. Then, should the resource be determined to be significant under either federal- or state-level criteria, and should the resource not be a candidate for avoidance or preservation in place, a data recovery plan shall be developed, reviewed by all Parties, and implemented. The research design and/or data recovery plan shall list the sampling procedures appropriate to ascertain the boundaries, nature, and content of the resource in accordance with current, professional archaeological best practices. Additionally, the data recovery plan will be designed to exhaust the research potential of the resource in accordance with current professional archaeology standards.

a. The treatment plans and data recovery plans shall be developed in consultation with the SMBMI and other consulting tribes.

b. All fieldwork related to treatment plans and data recovery plans shall require monitoring by both a SMBMI Tribal Monitor(s) (.....and monitor(s) from any other consulting tribe. This will be dependent on the number of Tribes requesting monitors.). Should more than one tribe be consulting, those tribes will, confer with the City of _____ and the Project proponent to arrive at a monitoring agreement in order to share monitoring assignments.

c. All draft reports containing the significance and treatment findings and data recovery results shall be prepared by a DOI-qualified archaeologist hired by the applicant/developer and submitted to the City of _____ Planning Department and the consulting Native American Tribes for their review and comment.

d. All final reports are to be submitted to the local CHRIS Information Center, the City of _____, and the consulting Native American Tribes.

II. The SMBMI requests that culturally-appropriate and professionally proper procedures shall be followed with respect to all artifacts and remains affiliated with Native peoples—whether prehistoric, protohistoric, or historic.

a. Any sacred/ceremonial objects or objects of cultural patrimony discovered within the project area are to be offered to the Most Likely Descendant (MLD) of record for appropriate treatment and all claims of ownership to such materials waived by the applicant/developer/landowner.

b. SMBMI requests that all other artifacts be permitted to be either (1) left *in situ* should avoidance or protection in place be guaranteed or (2) reburied, on site, in a location that will be protected from future disturbance *vis a vis* project plans, conservation/ preservation easements, deed riders, etc.



R-14 Cont.



LETTER R (Page 4 of 5)

c. Should it occur that avoidance, preservation in place, or on-site reburial are not an option for some artifacts, SMBMI requests that the applicant/developer/landowner relinquish all ownership and rights to this material and provide the artifacts to representatives of SMBMI and/or other consulting tribe(s) for the Tribes to jointly and collaboratively conduct proper treatments and delineate long-term care protocols.

d. Where appropriate and agreed upon in advance by both SMBMI and other consulting tribe(s), the DOI-qualified archaeologist hired by the applicant/developer may conduct analyses of certain artifact classes (including, but not limited to, shell, non-human bone, ceramic, stone) if required by CEQA, Section 106 of NHPA, the Project's mitigation measures, or conditions of approval for the Project. Furthermore, upon completion of authorized and mandatory archeological analyses, the applicant/developer shall provide said artifacts to SMBMI and any other consulting tribe—jointly and simultaneously --within sixty (60) days from the completion of analyses and not to exceed one hundred and twenty (120) days after the initial recovery of the items from the field.

HUMAN REMAINS AND FUNERARY OBJECTS; OBJECTS OR CULTURAL PATRIMONY

III. The City of _____ and the applicant/developer shall immediately contact the Coroner and the SMBMI in the event that any human remains are discovered during implementation of the Project. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner shall ensure that notification is provided to the NAHC within twenty-four (24) hours of the determination, as required by California Health and Safety Code § 7050.5 (c).

IV. The NAHC-identified Most Likely Descendant (MLD), shall be allowed, under California Public Resources Code § 5097.98 (a), to (1) inspect the site of the discovery and (2) make determinations as to how any human remains and funerary objects shall be treated and disposed of with appropriate dignity. The MLD, applicant/developer/landowner, and Lead Agency agree to discuss in good faith what constitutes "appropriate dignity" as that term is used in the applicable statutes.

V. The MLD shall complete its inspection within twenty-four (24) hours of receiving notification from either the Developer or the NAHC, as required by California Public Resources Code § 5097.98.

VI. Reburial of human remains and/or funerary objects shall be accomplished in compliance with the California Public Resources Code § 5097.98 (a) and (b). The MLD in consultation with the applicant/developer/landowner shall make the final discretionary determination regarding the appropriate disposition and treatment of human remains and funerary objects.

VII. All parties are aware that the MLD may wish to rebury the human remains and associated funerary objects, as well as ceremonial and cultural items (artifacts) on or near, the site of their discovery, in an area that shall not be subject to future subsurface disturbances. The applicant/developer/landowner should accommodate on-site reburial in a location mutually agreed upon by the Parties.

VIII. The term "human remains" encompasses more than human bones because the SMBMI traditions periodically necessitated the ceremonial burning of human remains and funerary objects. Funerary objects are those artifacts associated with any human remains or funerary rites. These

R-14 Cont.



LETTER R (Page 5 of 5)

items, and other funerary remnants and their ashes, are to be treated in the same manner as human bone fragments or bones that remain intact.

IX. It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, parties, and Lead Agencies, will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code § 6254 (r).

R-14 Cont.

DO NOT COPY

San Manuel Band of Mission Indians CEQA_AB52 language template.



San Manuel Band of Mission Indians – Comment Letter R

R-1:

City staff welcomes the continuation of dialog with the SMBMI regarding their concerns about the Project. In response to this comment letter, and in an effort to better understand the concerns of SMBMI in relation to the Project, City of Colton staff met with representatives of SMBMI on November 30, 2017. City of Colton staff remains open to further dialog regarding the Roquet Ranch Specific Plan Project and other projects that may affect tribal cultural resources affiliated with SMBMI.

R-2:

Subsection 4.4, *Cultural Resources*, fully evaluates the Project’s potential impacts on tribal cultural resources (TCRs) and archaeological resources, and provides mitigation measures to reduce the Project’s impacts to these resources to a level below significance. Two (2) archaeological resources are considered significant resources, which includes Site SBR-29,034 and Site SBR-29,037. The Project has been designed to avoid and preserve Site SBR-29,034 and Site SBR-29,037. The implementation of Mitigation Measure MM 4.4-2 would ensure that undiscovered subsurface archaeological resources that may be inadvertently uncovered during Project grading and excavation activities would not be destroyed through the use of Native American and archaeological monitoring during such activities. The City has revised Mitigation Measure MM 4.4-2 in response to this comment. Revisions to Mitigation Measure MM 4.4-2 are summarized in Table F-2, *Errata Table of Additions, Corrections, and Revisions*.

R-3:

The City has revised Mitigation Measure MM 4.4-2 in response to this comment. Revisions to Mitigation Measure MM 4.4-2 are summarized in Table F-2, *Errata Table of Additions, Corrections, and Revisions*.

R-4:

The City has revised Mitigation Measure MM 4.4-2 in response to this comment. Revisions to Mitigation Measure MM 4.4-2 are summarized in Table F-2, *Errata Table of Additions, Corrections, and Revisions*.

R-5:

The City has revised Mitigation Measure MM 4.4-2 in response to this comment. Revisions to Mitigation Measure MM 4.4-2 are summarized in Table F-2, *Errata Table of Additions, Corrections, and Revisions*.

R-6:

The City has revised Mitigation Measure MM 4.4-2 in response to this comment. Revisions to Mitigation Measure MM 4.4-2 are summarized in Table F-2, *Errata Table of Additions, Corrections, and Revisions*.



R-7:

The City has revised Mitigation Measure MM 4.4-2 in response to this comment. Revisions to Mitigation Measure MM 4.4-2 are summarized in Table F-2, *Errata Table of Additions, Corrections, and Revisions*.

R-8:

The Project site is within the ancestral territory of SMBMI, the SMBMI would be the 501c tribal entity responsible for overseeing the protection of Site SBR-29,034 and Site SBR-29,037 in perpetuity per Mitigation Measure MM 4.4-3.

R-9:

The City acknowledges the SMBMI's summary of correspondence between the City and the tribe as part of the AB 52 consultation process. Please refer to the City's response to comment R-1.

R-10:

Please see response to comment R-1. The City acknowledges SMBMI's request for further communication regarding the proposed Project. In response to this comment letter, and in an effort to better understand the concerns of SMBMI in relation to the Project, City of Colton staff met with representatives of SMBMI on November 30, 2017. City of Colton staff remains open to further dialog regarding the Roquet Ranch Specific Plan Project and other projects that may affect tribal cultural resources affiliated with SMBMI.

R-11:

Please see response to comments R-10.

R-12:

The City acknowledges SMBMI's comment expressing gratitude for the creation of open space for eight of the archaeological sites identified during the cultural resource survey.

R-13:

The City acknowledges SMBMI's reference to the goals and policies of the City's General Plan that are intended to protect and maintain cultural resources within the City. Subsection 4.4, *Cultural Resources*, of the DEIR fully evaluates the Project's impacts to cultural resources, and concluded that the Project would not impact any significant historic resources.

R-14:

The City acknowledges the preferred language provided by SMBMI concerning cultural resources and Tribal Cultural Resources (TCRs). The DEIR fully evaluated the Project's impacts to cultural resources and TCRs, and where potentially significant impacts have been identified, the DEIR identifies mitigation measures to reduce impacts to levels that are below significance. As indicated in the preceding responses, revisions were made to several mitigation measures related to cultural resources. However, those revisions primarily represent minor clarifications based on the



Commenter's preferred language and/or best practices and would result in mitigation measures that are functionally equivalent to those identified in the DEIR. Accordingly, no additional revisions to the mitigation measures (beyond those revisions discussed above) are warranted in response to this comment.



LETTER S (Page 1 of 1)



September 20, 2017

Mr. Mario Suarez, Senior Planner
City of Colton Planning Department
659 North La Cadena Drive
Colton, CA 92324

RE: Roquet Ranch Project—Draft CEQA Report
SCH #2016061056

Dear Mr. Suarez:

Spanish Town Heritage Foundation’s mission to champion the Hispanic Legacy of the Inland Empire’s first settlers is endangered by the City of Colton’s planned Roquet Ranch development. Noted by the National Park Service, the Bureau of Land Management, and the Old Spanish Trail Association, the area once known as La Placita de los Trujillos, Agua Mansa, San Salvador and Spanish Town is a site of “high historical potential.” Two historical structure/areas are immediately at risk and require further study.

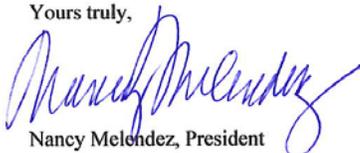
- The Trujillo Adobe is Riverside County Landmark #009, City of Riverside Landmark #130, and a California Site of Historical Significance #75 through the CA Office of Historic Preservation.
- The Agua Mansa Pioneer Cemetery, California Historical Landmark # 121.

Further, a nomination of the Trujillo Adobe to the National Register of Historic Places (and concurrently to the California Historic Preservation Office) is being prepared in partnership with the City of Riverside’s Historic Preservation Office.

The proposed area development can potentially cause extreme degradation and harm to this historic area. The Environmental Impact Report does not address this potential loss of archaeologically and historically significant site.

Spanish Town Heritage Foundation respectfully requests a response to the historic preservation issues listed above.

Yours truly,


Nancy Melendez, President
Spanish Town Heritage Foundation


Darlene Trujillo Elliot, Vice-President
Spanish Town Heritage Foundation

←

S-1

←

S-2

←

S-3

←

S-4

←



Spanish Town Heritage Foundation – Comment Letter S

S-1:

The acknowledges the mission of the Spanish Town Heritage Foundation and further acknowledges that the National Park Service (NPS) has identified Politana, Agua Mansa, and the Trujillo Adobe as high potential sites for trails. According to Section 12 of the National Trails System Act:

High potential sites are those historic sites related to the route or sites in close proximity thereto, which provide opportunity to interpret the historic significance of the trail during the period of its major use; criteria for consideration as high potential sites include historic significance, presence of visible historic remnants, scenic quality, and relative freedom from intrusion.¹⁸

Although identified as being high potential sites by the NPS, Politana, Agua Mansa, and the Trujillo Adobe are all located outside the Roquet Ranch Project physical disturbance areas and would not be impacted by the proposed Project. In addition, although Politana, Agua Mansa, and the Trujillo Adobe meet the National Trails System Act's definition of high potential sites, that does not mean that they have been evaluated, or listed, as significant resources under National Register of Historic Places criteria.

Additionally, although the exact location of the original trail is currently unknown, the NPS (2016) maps the trail along the present location of Agua Mansa Road, which is located approximately 1,500 feet northwest of the western Project site boundary. As no remnants of the trail were observed on the Project site or within the off-site improvement areas during the cultural resources survey (EIR *Technical Appendix FI*), it is not expected that the Project would have any impact on the any remnant portions of the trail. In addition, the Agua Mansa Pioneer Cemetery is located approximately 0.74-mile to the northwest of the Project site and is not located within the development impact area of the Project. Therefore, the Project would have no impact on the Agua Mansa Pioneer Cemetery. Accordingly, the DEIR adequately analyzed the potential for impacts to historical resources at the Project site and no revisions are warranted in the DEIR.

Based on the foregoing, no revisions to the DEIR are warranted with respect to this comment.

S-2:

The City acknowledges that the Trujillo Adobe has been nominated to be added to the National Register of Historic Places. As stated in comment S-1, the Trujillo Adobe is located outside of the Project's development footprint and would not be impacted by the Project. No revisions to the DEIR are warranted with respect to his comment.

¹⁸ U.S. Department of the Interior, National Park Service, 2016. Old Spanish National Historic Trail Final Comprehensive Administrative Strategy, 20.



S-3:

As discussed in the City's responses to comments S-1 and S-2 above, the Project would not affect the Trujillo Adobe or the Agua Mansa Pioneer Cemetery. Furthermore, the Project's impacts to historic, archaeological, and tribal cultural resources were fully evaluated in the DEIR. With mitigation, the Project would result in less-than-significant impacts to cultural resources. No revisions to the DEIR are warranted with respect to his comment.

S-4:

Please refer to the City's responses to comments S-1 through S-3 above for a response to the historic preservation issues discussed in this comment letter.



F.3 ADDITIONS, CORRECTIONS, AND REVISIONS TO THE DRAFT EIR

Substantive changes made to the text, tables and/or exhibits of the DEIR in response to public comments on the DEIR are discussed below and/or itemized in Table F-2, *Errata Table of Additions, Corrections, and Revisions*. Additions are shown in Table F-2 as underline text and deletions shown as ~~stricken~~ text. No corrections or additions made to the DEIR are considered substantial new information requiring recirculation or additional environmental review under CEQA Guidelines §15088.5.

Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
S-15 & 4.2-28	S.6.2 & 4.2.8	In response to Comment J-14 from GSESJA, Mitigation Measure MM 4.2-1 has been revised as follows: MM 4.2-1 Prior to issuance of grading permits, the City of Colton Building Official or his/her designee shall ensure that grading plans include a note that specifies that that all construction equipment greater than 150 horsepower is California Air Resources Board (CARB) Tier 4 3 Certified or better , <u>provided that Tier 3 Certified equipment may be used if the Lead Agency determines that Tier 4 Certified equipment is not reasonably available on a timely basis within a 200-mile radius of the Project site.</u> The Grading Contractor shall be responsible for ensuring compliance with this note throughout the duration of grading activities <u>and permit periodic inspection of the construction site by City of Colton staff or its designee to confirm compliance. These notes also shall be specified in bind documents and contracts issued to prospective construction contractors.</u>
S-15 & 4.2-27	S.6.2 & 4.2.8	In response to Comment E-11 from SCAQMD, Mitigation Measure MM 4.2-2 has been added as follows: <u>MM 4.2-2 Require the use of 2010 model year diesel haul trucks that conform to 2010 EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export), and if the Lead Agency determines that 2010 model year or newer diesel haul trucks cannot be obtained, the Lead Agency shall use trucks that meet EPA 2007 model year NO_x emissions requirements, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc., during construction period.</u>
S-26 & 4.3-38	S.6.2 & 4.3.8	In response to Comment F-7 from the San Bernardino County Department of Public Works, subpart 1 of Mitigation Measure MM 4.3-7 within EIR Subsection 4.3, <i>Biological Resources</i> , and EIR Section S.0, <i>Executive Summary</i> , was revised to clarify the nesting seasons for songbirds and raptors. Subpart 1 of Mitigation Measure MM 4.3-7 was revised as follows: 1. <u>Nesting season is typically February 15 to August 31 for songbirds, and January 15 to August 31 for raptors. Therefore,</u>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
		<p>Vegetation removal activities shall be scheduled outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to avoid potential impacts to nesting birds.</p>
<p>S-29 through S-31 & 4.4-30 through 4.4-31</p>	<p>S.6.2 & 4.4.7</p>	<p>In response to Comment C-4 from NAHC and Comments R-2 through R-7 from the San Manuel Band of Mission Indians, Mitigation Measure MM 4.4-2 in EIR Subsection 4.4, <i>Cultural Resources</i>, has been revised as follows:</p> <p>MM 4.4-2 Prior to the issuance of grading permits, the City of Colton Public Works Director or City Engineer or their designee and Development Services Director shall approve an Archeological Monitoring Plan<u>Program</u> and Data Recovery Protocol<u>Discovery and Treatment Plan</u>. The Archeological Monitoring Program<u>Plan</u> and Data Recovery Protocol<u>Discovery and Treatment Plan</u> shall include, at a minimum, the following elements:</p> <ol style="list-style-type: none"> 1. Written verification that a certified archaeologist <u>defined as meeting the Secretary of the Interior’s Standards for professional archaeology (U.S. Department of Interior, 2011)</u> has been retained to monitor grading activities and implement the Archeological Monitoring Program<u>Plan</u> and Data Recovery Protocol<u>Discovery and Treatment Plan</u>. This verification shall be presented in a letter from the project archaeologist to the City of Colton. 2. Written verification to the City of Colton that a Native American monitor(s) has been retained to be present during grading activities. The Native American monitor(s) shall work in concert with the archaeological monitor(s) to observe ground disturbances. 3. The Project archaeologist and Native American monitor(s) shall attend a pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program<u>plan</u>. 4. During the original cutting of previously undisturbed deposits, the archaeological monitor(s) and Native American monitor(s) shall be on-site, as determined by the consulting archaeologist, to perform periodic inspections of the excavations. The frequency of inspections shall depend upon the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. 5. Isolates and clearly non-significant deposits shall be documented in the field so that the monitored grading can continue. 6. In the event that previously unidentified cultural resources are discovered (other than isolates and clearly non-significant



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
		<p>deposits), the consulting archaeologist shall have the authority to divert or temporarily halt ground disturbance operation in the area of the discovery to allow for the evaluation of potentially significant cultural resources. The archaeologist shall contact the City of Colton Building Official or their designee at the time of discovery. The archaeologist, in consultation with the City of Colton Building Official or their designee, shall determine the significance of the discovered resources. The City of Colton Building Official or their designee must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the City of Colton Building Official or their designee before being carried out using professional archaeological methods. <u>The City of Colton shall consult with the appropriate consulting Native American tribe(s) in determining appropriate treatment for unearthed cultural resources if the resources are prehistoric or Native American in nature. In the event that previously unidentified tribal cultural resources are discovered, the Native American monitors shall have the authority to divert or temporarily halt ground disturbance operation in the area of the discovery to allow for the evaluation of potentially significant tribal cultural resources.</u> If any human bones <u>remains and/or cremations</u> are discovered, the San Bernardino County coroner and City of Colton Building Official or their designee shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains. Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The archaeological monitor(s) shall determine the amount of material to be recovered for an adequate artifact sample for analysis, <u>and a treatment plan shall be developed and reviewed in consultation with the consulting Native American tribe(s).</u></p> <p>7. Any cultural resource material collected during the implementation of the Archeological Monitoring Program Plan and Data Recovery Protocol <u>Discovery and Treatment Plan</u> shall be processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an</p>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
		<p>appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation.</p> <p>8. A report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the satisfaction of the City of Colton Building Official or their designee prior to the issuance of any building permits. The report will include DPR Primary and Archaeological Site Forms.</p>
S-48 & 4.2-28	S.6.2 & 4.2.8	<p>In response to Comment J-23 issued by GSESJA, Mitigation Measure MM 4.10-1 has been revised as follows: MM 4.10-1 Prior to issuance of any grading and building permits, the City of Colton shall review grading and building plans to ensure the following notes are included on the plans. Project contractors shall be required to comply with these notes and maintain written records of such compliance that can be inspected by the City of Colton upon request. <u>The Grading Contractor shall permit periodic inspection of the construction site by City of Colton staff or its designee to confirm compliance. These notes also shall be specified in bind documents and contracts issued to prospective construction contractors.</u></p>
3-28	3.4.1	<p>EIR Section 3.0, <i>Project Description</i>, was revised to state that Phase I of the Project would include the demolition and removal of the existing on-site Roquet Paving facility structures and associated improvements located on the southeast portion of the Project site. Subpart C of subsection 3.4.1 was revised as follows:</p> <p>Phase I generally covers the southern and eastern portions of the Roquet Ranch Specific Plan, and would include: residential Planning Areas 2, 3, 6 through 10, 13, and would encompass Open Space-Resource Planning Areas 20A, 20B, 20E, the Neighborhood Commercial area within Planning Area 11, and the Fire Station Site (or residential alternative). The neighborhood parks within Planning Areas 18 and 19 would also be constructed as part of Phase I. Pellissier Road, Orange Street, and Roquet Ranch Road would also be constructed as part of this phase. Maryknoll Drive would be re-aligned to connect with Graymoor Avenue which would allow Pellissier Road at La Cadena Drive to be the primary access point to the Roquet Ranch community. The associated roads and all necessary utilities would also be constructed. <u>Additionally, Phase I would include the demolition and removal of the existing on-site Roquet Paving facility structures and associated improvements located on the southeast portion of the Project site to accommodate the proposed Project.</u></p>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
S-55 through S-56, 4.14-36 through 4.14-37	S.6.2 and 4.14.10	<p>Mitigation Measure MM 4.14-4 was added to EIR Subsection 4.14, <i>Transportation and Traffic</i>. Mitigation Measure MM 4.14-4 is identified as follows:</p> <p><u>The Project Applicant shall use reasonable efforts to work with the City of Riverside to prepare a fee study and establish a mitigation fee program that identifies fair share funding sources attributable to and paid from private and public development to supplement other funding sources to construct the following improvements:</u></p> <ul style="list-style-type: none"> • <u>Intersection #3 – Main Street / Strong Street: Restripe eastbound approach to provide for a dedicated left turn lane and a shared through-right turn lane.</u> • <u>Intersection #5 – Orange Street / West Center Street: Install a traffic signal.</u> <p><u>The Project Applicant shall use reasonable efforts to engage the City of Riverside to undertake this study, but it is acknowledged that the Project Applicant cannot compel the City of Riverside to participate in this process. The study shall identify fair-share fees related to private and/or public development based on nexus requirements contained in the Mitigation Fee Act (Govt. Code § 66000 et seq.) and 14 Cal. Code of Regs. § 15126.4(a)(4). The fee study shall also be compliant with Government Code § 66001(g) and any other applicable provisions of law. If the fee study is completed and a mitigation fee program is adopted by the City of Riverside for the above-listed improvements to Intersection #3 – Main Street / Strong Street and Intersection #5 – Orange Street / West Center Street, the Project Applicant shall pay the fair share amount to the City of Riverside within one year of the issuance of the Project's first certificate of occupancy. If the City of Riverside chooses to accept the Project Applicant's fair share payment, the City of Riverside shall apply the payment to the fee program adopted by the City of Riverside to construct the above-listed improvements to Intersection #3 – Main Street / Strong Street and Intersection #5 – Orange Street / West Center Street. The City of Riverside shall only accept the fair share payment if the fair share fee study has been completed and mitigation fee program established. If, within three (3) years from the date that the first certificate of occupancy is issued for the Project, the City of Riverside has not completed the fair share fee study and established a mitigation fee program for construction of above-listed improvements to Intersection #3 – Main Street / Strong Street and Intersection #5 – Orange Street / West Center Street, then the Project Applicant shall have no further obligation to attempt to comply with this mitigation measure.</u></p>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
S-56 through S-57 and 4.14-37	S.6.2 and 4.14.10	<p>In response to Comment G-4 issued by the City of Grand Terrace, EIR Subsection 4.14, <i>Transportation and Traffic</i>, Mitigation Measure MM 4.14-5 was added to address the concerns expressed by the City of Grand Terrace regarding the Project’s significant and unavoidable cumulatively considerable impacts to the intersections of Michigan Avenue and West Main Street (Intersection #36) and Mt. Vernon Avenue and Main Street (Intersection #38). Mitigation Measure MM 4.14-5 imposes the following:</p> <p><u>The Project Applicant shall use reasonable efforts to work with the City of Grand Terrace to prepare a fee study and establish a mitigation fee program that identifies fair share funding sources attributable to and paid from private and public development to supplement other funding sources to construct the following improvements:</u></p> <ul style="list-style-type: none"> • <u>Intersection #36 – Michigan Avenue / West Main Street: Add southbound right-turn lane; and</u> • <u>Intersection #38 – Mt. Vernon Avenue / Main Street: (1) Install a traffic signal; (2) Add eastbound left-turn lane.</u> <p><u>The Project Applicant shall use reasonable efforts to engage the City of Grand Terrace to undertake this study, but it is acknowledged that the Project Applicant cannot compel the City of Grand Terrace to participate in this process. The study shall identify fair-share fees related to private and/or public development based on nexus requirements contained in the Mitigation Fee Act (Govt. Code § 66000 et seq.) and 14 Cal. Code of Regs. § 15126.4(a)(4). The fee study shall also be compliant with Government Code § 66001(g) and any other applicable provisions of law. If the fee study is completed and a mitigation fee program is adopted by City of Grand Terrace for the improvements to Intersection #36 and Intersection #38 described above, the Project Applicant shall pay the fair share amount to the City of Grand Terrace within one year of the issuance of the Project's first certificate of occupancy. If the City of Grand Terrace chooses to accept the Project Applicant’s fair share payment, the City of Grand Terrace shall apply the payment to the fee program adopted by the City of Grand Terrace to construct the improvements to Intersection #36 and Intersection #38 described above. The City of Grand Terrace shall only accept the fair share payment if the fair share fee study has been completed and mitigation fee program established. If, within three (3) years from the date that the first certificate of occupancy is issued for the Project, the City of Grand Terrace has not completed the fair share</u></p>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
		<p><u>fee study and established a mitigation fee program for the improvements to Intersection #36 and Intersection #38 described above, then the Project Applicant shall have no further obligation to attempt to comply with this mitigation measure.</u></p>
S-58 and 4.14-38	S.6.2 and 4.14.10	<p>On page 4.14-38 of EIR Subsection 4.14, <i>Transportation and Traffic</i>, Mitigation Measure MM 4.14-4 has changed to Mitigation Measure MM 4.14-6 due to the addition of Mitigation Measures MM 4.14-4 and MM 4.14-5 (as discussed above). References to Mitigation Measure MM 4.14-6 (formerly Mitigation Measure MM 4.14-4) have been updated throughout EIR Subsection 4.14, <i>Transportation and Traffic</i>, and in all other references throughout the EIR.</p>
4.14-39 through 4.14-41	4.14.11	<p>On page 4.14-39 in EIR subsection 4.14.11, <i>Significance of Impacts After Mitigation</i>, the discussion of the Project’s cumulatively considerable impacts to Intersection #3, Intersection #5, and Intersection #36 under the Opening Year Cumulative (2020) scenario was modified to incorporate a reference to implementation of the newly added Mitigation Measure MM 4.14-4. This paragraph was revised as follows:</p> <p>The Project would also result in cumulatively considerable impacts to Intersections #1, #3, #5, #14 and #36 under the Opening Year Cumulative (2020) conditions scenario. Intersections #3, #5, and #14 are located outside of the geographic limits of the City of Colton. Because there is no funding mechanism available for development projects to contribute toward the construction of needed improvements located outside of the geographic limits of the City of Colton (<u>including the improvements to Intersections #3 and #5 stated in Mitigation Measure MM 4.14-4 and improvements to Intersection #36 stated in Mitigation Measure MM 4.14-5</u>), the Project’s cumulatively considerable impacts to Intersections #3, #5, #14, and #36 would be significant and unavoidable. As stated above, because the improvements to Intersection #1 that are listed in Mitigation Measure MM 4.14-3 are not part of an established City of Colton fee program, there is no assurance that the improvements will be implemented at their time of need and therefore the Project’s cumulatively considerable impacts to Intersection #1 would be unavoidable.</p> <p>On page 4.14-39 in EIR subsection 4.14.11, <i>Significance of Impacts After Mitigation</i>, the discussion of the Project’s cumulatively considerable impacts to Intersections #3, #5, and #38 under the Horizon Year (2040) scenario was modified to incorporate a reference</p>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
		<p>to implementation of the newly added Mitigation Measure MM 4.14-4. This paragraph was revised as follows:</p> <p>The Project would result in cumulatively considerable impacts to Intersections #3, #5, #18, #20, #22, and #38 under the Horizon Year (2040) conditions scenario. Intersections #3 and #5 are located outside of the geographic limits of the City of Colton. Because there is no funding mechanism available for development projects to contribute toward the construction of needed improvements located outside of the geographic limits of the City of Colton <u>(including the improvement to Intersections #3 and #5 stated in Mitigation Measure MM 4.14-4 and improvements to Intersection #38 stated in Mitigation Measure MM 4.14-5)</u>, the Project’s cumulatively considerable impacts to Intersections #3 and #5 would be significant and unavoidable. Because the improvements to Intersections #18, #20, and #22 that are listed in Mitigation Measure MM 4.14-3 are not part of an established City of Colton fee program, there is no assurance that the improvements will be implemented at their time of need. Therefore, the Project’s cumulatively considerable impacts to Intersections #18, #20, and #22 would be unavoidable. Under the Horizon Year Cumulative (2040) scenario, the Project would result in a cumulatively considerable impact to Roadway Segment #5 – La Cadena Drive between West Litton Avenue and Barton Road, which is located outside of the geographic limits of the City of Colton. Because there is no funding mechanism available for development projects to contribute toward the construction of needed improvements located outside of the geographic limits of the City of Colton, the Project’s cumulatively considerable impacts to Roadway Segment #5 would be unavoidable.</p> <p>On page 4.14-40 in EIR subsection 4.14.11, <i>Significance of Impacts After Mitigation</i>, the discussion of the Project’s direct impacts to Intersection #3 under the E+P scenario was modified to incorporate a reference to implementation of the newly added Mitigation Measure MM 4.14-4. This paragraph was revised as follows:</p> <p>As shown in Table 4.14-11, <i>Intersection Analysis for E+P Conditions with Improvements</i>, Intersection #21 (South La Cadena Drive / West Maryknoll Drive), #27 (South Iowa Avenue / South La Cadena Drive / I-215 southbound off-ramp), and #29 (South Iowa Avenue / I-215 northbound ramps) would operate at an acceptable LOS (LOS D or better) under the Existing plus Project scenario with implementation of the improvements identified in Mitigation Measure MM 4.14-2. Because Intersection #3 (Main Street / Strong Street) is located in the City of Riverside outside of</p>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
		<p>the geographic limits of the City of Colton (Lead Agency), there is no funding mechanism in place to allow development projects within the City of Colton to contribute a fair-share payment to contribute to future improvements and off-set significant traffic impacts within another jurisdiction. <u>Mitigation Measure MM 4.14-4 has been identified to require the Project Applicant to make a good faith effort to work with the City of Riverside to establish a mitigation fee program that would allow for the Project Applicant to make fair share payments to the City to fund the construction of recommended improvements to Intersection #3.</u> As such, <u>Notwithstanding implementation of Mitigation Measure MM 4.14-4,</u> the Lead Agency could not assure that construction of improvements within a different jurisdiction would be completed in a timely manner to fully mitigate impacts resulting from the Project. Accordingly, the Project would have a direct significant and unavoidable impact on Intersection #3 (Main Street / Strong Street) in the City of Riverside under the E+P conditions scenario.</p> <p>On page 4.14-41 in EIR subsection 4.14.11, <i>Significance of Impacts After Mitigation</i>, the discussion of the Project’s cumulatively considerable impacts to Intersections #3, #5, and #36 under the Opening Year Cumulative (2020) Conditions scenario was modified to incorporate a reference to implementation of the newly added Mitigation Measure MM 4.14-4. This paragraph was revised as follows:</p> <p>As shown in Table 4.14-12, <i>Intersection Analysis for Opening Year Cumulative (2020) Conditions with Improvements</i>, all intersections in the Project study area would operate at acceptable LOS with implementation of the recommended improvements. Implementation of the improvements required by Mitigation Measure MM 4.14-2 would reduce the Project’s cumulatively considerable impacts to Intersection #21 to less than cumulatively considerable (as shown in Table 4.14-12). However, the Project would result in cumulatively considerable impacts to five intersections (#1, #3, #5, #14 and #36) which the Project would have cumulatively considerable impacts under the Open Year Cumulative (2020) conditions scenario would require improvements that are: 1) located outside the geographic limits of the City of Colton (meaning the City of Colton cannot assure that the recommended improvements would be implemented); 2) funded by existing mitigation funding programs, for which a timetable for construction is not yet available (meaning the necessary improvements may not be in place when the Project becomes operational and starts to contribute traffic to the</p>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
		<p>facilities); and/or 3) not included in any existing mitigation funding program (meaning there is no mechanism available for development projects to contribute toward the construction of needed improvements). Intersections #3, #5, #14, and #36 are located outside of the geographic limits of the City of Colton. Because there is no funding mechanism available for development projects to contribute toward the construction of needed improvements located outside of the geographic limits of the City of Colton <u>(including the improvements to Intersections #3 and #5 stated in Mitigation Measure MM 4.14-4, and improvements to Intersection #36 stated in Mitigation Measure MM 4.14-5)</u>, the Project’s cumulatively considerable impacts to Intersections #3, #5, #14, and #36 would be unavoidable. Because the improvements to Intersection #1 that are listed in Mitigation Measure MM 4.14-3 are not part of an established City of Colton fee program, there is no assurance that the improvements will be implemented at their time of need and therefore the Project’s cumulatively considerable impacts to Intersection #1 would be unavoidable. No other feasible mitigation measures for these cumulatively considerable impacts are available to the Project that would have a proportional nexus to the Project’s traffic impact to these facilities.</p> <p>On page 4.14-41 in EIR subsection 4.14.11, <i>Significance of Impacts After Mitigation</i>, the discussion of the discussion of the Project’s cumulatively considerable impacts to Intersections #3, #5, and #38 under the Horizon Year (2040) Conditions scenario was modified to incorporate a reference to implementation of the newly added Mitigation Measure MM 4.14-4. This paragraph was revised as follows:</p> <p>As shown in Table 4.14-14, <i>Intersection Analysis for Horizon Year (2040) Conditions with Improvements</i>, all intersections in the Project study area would operate at acceptable LOS with recommended improvements. Implementation of the improvements required by Mitigation Measure MM 4.14-2 would reduce the Project’s cumulatively considerable impacts to Intersection #21 to levels that are less than cumulatively considerable (as shown in Table 4.14-14). The Project would result in cumulatively considerable impacts to Intersections #3, #5, #18, #20, #22, and #38 under the Horizon Year (2040) conditions scenario. Intersections #3 and #5 are located outside of the geographic limits of the City of Colton. Because there is no funding mechanism available for development projects to contribute toward the construction of needed improvements located outside of the geographic limits of the City of Colton</p>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
		<p><u>(including the improvement to Intersections #3 and #5 stated in Mitigation Measure MM 4.14-4, and improvements to Intersection #38 stated in Mitigation Measure MM 4.14-5), the Project’s cumulatively considerable impacts to Intersections #3 and #5 would be significant and unavoidable. Because the improvements to Intersections #18, #20, and #22 that are listed in Mitigation Measure MM 4.14-3 are not part of an established City of Colton fee program, there is no assurance that the improvements will be implemented at their time of need. Therefore, the Project’s cumulatively considerable impacts to Intersections #18, #20, and #22 would be unavoidable. No other feasible mitigation measures for these cumulatively considerable impacts are available to the Project that would have a proportional nexus to the Project’s traffic impact to these facilities.</u></p>
7-8	7.3.2	<p>In order to respond to Comment A-8 issued by DTSC, two (2) Phase I Environmental Site Assessment reports were added to the administrative record. The following two references were added to EIR Section 8.0, <i>References</i>:</p> <p><u>LAI, 2014b. Leighton and Associates, Inc. (LAI). 2014b. <i>Phase I Environmental Site Assessment, Roquet Ranch, Northwest and Southeast of 2699 Maryknoll Drive, APNs 1167-021-05, 1167-021-21, and Portions of 1167-011-01 and 1167-021-01, City of Colton, San Bernardino County, California.</i> Dated October 13, 2014.</u></p> <p><u>LAI. 2015b. <i>Phase I Environmental Site Assessment, Roquet Ranch, 9-Acre Parcel North of Center Street and Orange Street, APNs 1167-021-23 and a Portion of 1167-021-22, City of Colton, San Bernardino County, California.</i> Dated June 18, 2015.</u></p>
S-26 & 4.3-38	S.6.2 & 4.3.8	<p>In response to Comment F-7 from the San Bernardino County Department of Public Works, subpart 1 of Mitigation Measure MM 4.3-7 within EIR Subsection 4.3, <i>Biological Resources</i>, and EIR Section S.0, <i>Executive Summary</i>, was revised to clarify the nesting seasons for songbirds and raptors. Subpart 1 of Mitigation Measure MM 4.3-7 was revised as follows:</p> <ol style="list-style-type: none"> <u>Nesting season is typically February 15 to August 31 for songbirds, and January 15 to August 31 for raptors. Therefore, vegetation removal activities shall be scheduled outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to avoid potential impacts to nesting birds.</u>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
S-30 & 4.4-31	S.6.2 & 4.4.7	<p>In response to Comment C-4 from NAHC, subpart 6 of Mitigation Measure MM 4.4-2 within EIR Subsection 4.4, <i>Cultural Resources</i>, and EIR Section S.0, <i>Executive Summary</i>, was revised to explicitly state that the Native American monitor shall have the authority to divert or temporarily halt excavation activities in the event that a potentially significant tribal cultural resource is inadvertently discovered. Subpart 6 of Mitigation Measure MM 4.4-2 was revised as follows:</p> <p>6. In the event that previously unidentified cultural resources are discovered (other than isolates and clearly non-significant deposits), the consulting archaeologist shall have the authority to divert or temporarily halt ground disturbance operation in the area of the discovery to allow for the evaluation of potentially significant cultural resources. The archaeologist shall contact the City of Colton Building Official or their designee at the time of discovery. The archaeologist, in consultation with the City of Colton Building Official or their designee, shall determine the significance of the discovered resources. The City of Colton Building Official or their designee must concur with the evaluation before construction activities will be allowed to resume in the affected area. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the City of Colton Building Official or their designee before being carried out using professional archaeological methods. <u>In the event that previously unidentified tribal cultural resources are discovered, the Native American monitor shall have the authority to divert or temporarily halt ground disturbance operation in the area of the discovery to allow for the evaluation of potentially significant tribal cultural resources.</u> If any human bones are discovered, the San Bernardino County coroner and City of Colton Building Official or their designee shall be contacted. In the event that the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the NAHC, shall be contacted in order to determine proper treatment and disposition of the remains. Before construction activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological methods. The archaeological monitor(s) shall determine the amount of material to be recovered for an adequate artifact sample for analysis.</p>
3-28	3.4.1	<p>In response to Comment J-5, EIR Section 3.0, <i>Project Description</i>, was revised to state that Phase I of the Project would include the demolition and removal of the existing on-site Roquet Paving facility structures and associated improvements located on the southeast portion of the Project site. Subpart C of subsection 3.4.1 was revised as follows:</p>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
		<p>Phase I generally covers the southern and eastern portions of the Roquet Ranch Specific Plan, and would include: residential Planning Areas 2, 3, 6 through 10, 13, and would encompass Open Space-Resource Planning Areas 20A, 20B, 20E, the Neighborhood Commercial area within Planning Area 11, and the Fire Station Site (or residential alternative). The neighborhood parks within Planning Areas 18 and 19 would also be constructed as part of Phase I. Pellissier Road, Orange Street, and Roquet Ranch Road would also be constructed as part of this phase. Maryknoll Drive would be re-aligned to connect with Graymoor Avenue which would allow Pellissier Road at La Cadena Drive to be the primary access point to the Roquet Ranch community. The associated roads and all necessary utilities would also be constructed. <u>Additionally, Phase I would include the demolition and removal of the existing on-site Roquet Paving facility structures and associated improvements located on the southeast portion of the Project site to accommodate the proposed Project.</u></p>
<p>S-55 through S-56, 4.14-36 through 4.14-37</p>	<p>S.6.2 and 4.14.10</p>	<p>In response to Comments H-9 and H-10 issued by the City of Riverside, Mitigation Measure MM 4.14-4 was added to EIR Subsection 4.14, <i>Transportation and Traffic</i>, to address the concerns expressed by the City of Riverside regarding the Project’s significant and unavoidable impacts to the intersection of Main Street and Strong Street and the intersection of Orange Street and West Center Street (respectively identified as Intersection #3 and Intersection #5 in the TIA and EIR Subsection 4.14, <i>Transportation and Traffic</i>). Mitigation Measure MM 4.14-4 imposes the following:</p> <p><u>The Project Applicant shall use reasonable efforts to work with the City of Riverside to prepare a fee study and establish a mitigation fee program that identifies fair share funding sources attributable to and paid from private and public development to supplement other funding sources to construct the following improvements:</u></p> <ul style="list-style-type: none"> • <u>Intersection #3 – Main Street / Strong Street: Restripe eastbound approach to provide for a dedicated left turn lane and a shared through-right turn lane.</u> • <u>Intersection #5 – Orange Street / West Center Street: Install a traffic signal.</u> <p><u>The Project Applicant shall use reasonable efforts to engage the City of Riverside to undertake this study, but it is acknowledged that the Project Applicant cannot compel the City of Riverside to participate in this process. The study shall identify fair-share fees related to private and/or public development based on nexus requirements contained in the Mitigation Fee Act (Govt. Code §</u></p>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
		<p><u>66000 et seq.) and 14 Cal. Code of Regs. § 15126.4(a)(4). The fee study shall also be compliant with Government Code § 66001(g) and any other applicable provisions of law. If the fee study is completed and a mitigation fee program is adopted by the City of Riverside for the above-listed improvements to Intersection #3 – Main Street / Strong Street and Intersection #5 – Orange Street / West Center Street, the Project Applicant shall pay the fair share amount to the City of Riverside within one year of the issuance of the Project's first certificate of occupancy. If the City of Riverside chooses to accept the Project Applicant's fair share payment, the City of Riverside shall apply the payment to the fee program adopted by the City of Riverside to construct the above-listed improvements to Intersection #3 – Main Street / Strong Street and Intersection #5 – Orange Street / West Center Street. The City of Riverside shall only accept the fair share payment if the fair share fee study has been completed and mitigation fee program established. If, within three (3) years from the date that the first certificate of occupancy is issued for the Project, the City of Riverside has not completed the fair share fee study and established a mitigation fee program for construction of above-listed improvements to Intersection #3 – Main Street / Strong Street and Intersection #5 – Orange Street / West Center Street, then the Project Applicant shall have no further obligation to attempt to comply with this mitigation measure.</u></p>
<p>S-56 through S-57 and 4.14-37</p>	<p>S.6.2 and 4.14.10</p>	<p>In response to Comment G-4 issued by the City of Grand Terrace, EIR Subsection 4.14, <i>Transportation and Traffic</i>, Mitigation Measure MM 4.14-5 was added to address the concerns expressed by the City of Grand Terrace regarding the Project's significant and unavoidable cumulatively considerable impacts to the intersections of Michigan Avenue and West Main Street (Intersection #36) and Mt. Vernon Avenue and Main Street (Intersection #38). Mitigation Measure MM 4.14-5 imposes the following:</p> <p><u>The Project Applicant shall use reasonable efforts to work with the City of Grand Terrace to prepare a fee study and establish a mitigation fee program that identifies fair share funding sources attributable to and paid from private and public development to supplement other funding sources to construct the following improvements:</u></p> <ul style="list-style-type: none"> • <u>Intersection #36 – Michigan Avenue / West Main Street: Add southbound right-turn lane; and</u> • <u>Intersection #38 – Mt. Vernon Avenue / Main Street: (1) Install a traffic signal; (2) Add eastbound left-turn lane.</u>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
		<p><u>The Project Applicant shall use reasonable efforts to engage the City of Grand Terrace to undertake this study, but it is acknowledged that the Project Applicant cannot compel the City of Grand Terrace to participate in this process. The study shall identify fair-share fees related to private and/or public development based on nexus requirements contained in the Mitigation Fee Act (Govt. Code § 66000 et seq.) and 14 Cal. Code of Regs. § 15126.4(a)(4). The fee study shall also be compliant with Government Code § 66001(g) and any other applicable provisions of law. If the fee study is completed and a mitigation fee program is adopted by City of Grand Terrace for the improvements to Intersection #36 and Intersection #38 described above, the Project Applicant shall pay the fair share amount to the City of Grand Terrace within one year of the issuance of the Project's first certificate of occupancy. If the City of Grand Terrace chooses to accept the Project Applicant's fair share payment, the City of Grand Terrace shall apply the payment to the fee program adopted by the City of Grand Terrace to construct the improvements to Intersection #36 and Intersection #38 described above. The City of Grand Terrace shall only accept the fair share payment if the fair share fee study has been completed and mitigation fee program established. If, within three (3) years from the date that the first certificate of occupancy is issued for the Project, the City of Grand Terrace has not completed the fair share fee study and established a mitigation fee program for the improvements to Intersection #36 and Intersection #38 described above, then the Project Applicant shall have no further obligation to attempt to comply with this mitigation measure.</u></p>
S-58 and 4.14-38	S.6.2 and 4.14.10	<p>On page 4.14-38 of EIR Subsection 4.14, <i>Transportation and Traffic</i>, Mitigation Measure MM 4.14-4 has changed to Mitigation Measure MM 4.14-6 due to the addition of Mitigation Measures MM 4.14-4 and MM 4.14-5 (as discussed above). References to Mitigation Measure MM 4.14-6 (formerly Mitigation Measure MM 4.14-4) have been updated throughout EIR Subsection 4.14, <i>Transportation and Traffic</i>.</p>
4.14-39 through 4.14-41	4.14.11	<p>On page 4.14-39 in EIR subsection 4.14.11, <i>Significance of Impacts After Mitigation</i>, the discussion of the Project's cumulatively considerable impacts to Intersection #3, Intersection #5, and Intersection #36 under the Opening Year Cumulative (2020) scenario was modified to incorporate a reference to implementation of the newly added Mitigation Measure MM 4.14-4. This paragraph was revised as follows:</p>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
		<p>The Project would also result in cumulatively considerable impacts to Intersections #1, #3, #5, #14 and #36 under the Opening Year Cumulative (2020) conditions scenario. Intersections #3, #5, and #14 are located outside of the geographic limits of the City of Colton. Because there is no funding mechanism available for development projects to contribute toward the construction of needed improvements located outside of the geographic limits of the City of Colton (<u>including the improvements to Intersections #3 and #5 stated in Mitigation Measure MM 4.14-4 and improvements to Intersection #36 stated in Mitigation Measure MM 4.14-5</u>), the Project’s cumulatively considerable impacts to Intersections #3, #5, #14, and #36 would be significant and unavoidable. As stated above, because the improvements to Intersection #1 that are listed in Mitigation Measure MM 4.14-3 are not part of an established City of Colton fee program, there is no assurance that the improvements will be implemented at their time of need and therefore the Project’s cumulatively considerable impacts to Intersection #1 would be unavoidable.</p> <p>On page 4.14-39 in EIR subsection 4.14.11, <i>Significance of Impacts After Mitigation</i>, the discussion of the Project’s cumulatively considerable impacts to Intersections #3, #5, and #38 under the Horizon Year (2040) scenario was modified to incorporate a reference to implementation of the newly added Mitigation Measure MM 4.14-4. This paragraph was revised as follows:</p> <p>The Project would result in cumulatively considerable impacts to Intersections #3, #5, #18, #20, #22, and #38 under the Horizon Year (2040) conditions scenario. Intersections #3 and #5 are located outside of the geographic limits of the City of Colton. Because there is no funding mechanism available for development projects to contribute toward the construction of needed improvements located outside of the geographic limits of the City of Colton (<u>including the improvement to Intersections #3 and #5 stated in Mitigation Measure MM 4.14-4 and improvements to Intersection #38 stated in Mitigation Measure MM 4.14-5</u>), the Project’s cumulatively considerable impacts to Intersections #3 and #5 would be significant and unavoidable. Because the improvements to Intersections #18, #20, and #22 that are listed in Mitigation Measure MM 4.14-3 are not part of an established City of Colton fee program, there is no assurance that the improvements will be implemented at their time of need. Therefore, the Project’s cumulatively considerable impacts to Intersections #18, #20, and #22 would be unavoidable. Under the Horizon Year Cumulative (2040) scenario, the Project would result in a cumulatively considerable impact to Roadway Segment #5 – La Cadena Drive</p>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
		<p>between West Litton Avenue and Barton Road, which is located outside of the geographic limits of the City of Colton. Because there is no funding mechanism available for development projects to contribute toward the construction of needed improvements located outside of the geographic limits of the City of Colton, the Project’s cumulatively considerable impacts to Roadway Segment #5 would be unavoidable.</p> <p>On page 4.14-40 in EIR subsection 4.14.11, <i>Significance of Impacts After Mitigation</i>, the discussion of the Project’s direct impacts to Intersection #3 under the E+P scenario was modified to incorporate a reference to implementation of the newly added Mitigation Measure MM 4.14-4. This paragraph was revised as follows:</p> <p>As shown in Table 4.14-11, <i>Intersection Analysis for E+P Conditions with Improvements</i>, Intersection #21 (South La Cadena Drive / West Maryknoll Drive), #27 (South Iowa Avenue / South La Cadena Drive / I-215 southbound off-ramp), and #29 (South Iowa Avenue / I-215 northbound ramps) would operate at an acceptable LOS (LOS D or better) under the Existing plus Project scenario with implementation of the improvements identified in Mitigation Measure MM 4.14-2. Because Intersection #3 (Main Street / Strong Street) is located in the City of Riverside outside of the geographic limits of the City of Colton (Lead Agency), there is no funding mechanism in place to allow development projects within the City of Colton to contribute a fair-share payment to contribute to future improvements and off-set significant traffic impacts within another jurisdiction. <u>Mitigation Measure MM 4.14-4 has been imposed to require the Project Applicant to make a good faith effort to work with the City of Riverside to establish a mitigation fee program that would allow for the Project Applicant to make fair share payments to the City to fund the construction of recommended improvements to Intersection #3. As such, Notwithstanding implementation of Mitigation Measure MM 4.14-4,</u> the Lead Agency could not assure that construction of improvements within a different jurisdiction would be completed in a timely manner to fully mitigate impacts resulting from the Project. Accordingly, the Project would have a direct significant and unavoidable impact on Intersection #3 (Main Street / Strong Street) in the City of Riverside under the E+P conditions scenario.</p> <p>On page 4.14-41 in EIR subsection 4.14.11, <i>Significance of Impacts After Mitigation</i>, the discussion of the Project’s cumulatively considerable impacts to Intersections #3, #5, and #36 under the Opening Year Cumulative (2020) Conditions scenario was modified to</p>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
		<p>incorporate a reference to implementation of the newly added Mitigation Measure MM 4.14-4. This paragraph was revised as follows:</p> <p>As shown in Table 4.14-12, <i>Intersection Analysis for Opening Year Cumulative (2020) Conditions with Improvements</i>, all intersections in the Project study area would operate at acceptable LOS with implementation of the recommended improvements. Implementation of the improvements required by Mitigation Measure MM 4.14-2 would reduce the Project’s cumulatively considerable impacts to Intersection #21 to less than cumulatively considerable (as shown in Table 4.14-12). However, the Project would result in cumulatively considerable impacts to five intersections (#1, #3, #5, #14 and #36) which the Project would have cumulatively considerable impacts under the Open Year Cumulative (2020) conditions scenario would require improvements that are: 1) located outside the geographic limits of the City of Colton (meaning the City of Colton cannot assure that the recommended improvements would be implemented); 2) funded by existing mitigation funding programs, for which a timetable for construction is not yet available (meaning the necessary improvements may not be in place when the Project becomes operational and starts to contribute traffic to the facilities); and/or 3) not included in any existing mitigation funding program (meaning there is no mechanism available for development projects to contribute toward the construction of needed improvements). Intersections #3, #5, #14, and #36 are located outside of the geographic limits of the City of Colton. Because there is no funding mechanism available for development projects to contribute toward the construction of needed improvements located outside of the geographic limits of the City of Colton <u>(including the improvements to Intersections #3 and #5 stated in Mitigation Measure MM 4.14-4, and improvements to Intersection #36 stated in Mitigation Measure MM 4.14-5)</u>, the Project’s cumulatively considerable impacts to Intersections #3, #5, #14, and #36 would be unavoidable. Because the improvements to Intersection #1 that are listed in Mitigation Measure MM 4.14-3 are not part of an established City of Colton fee program, there is no assurance that the improvements will be implemented at their time of need and therefore the Project’s cumulatively considerable impacts to Intersection #1 would be unavoidable. No other feasible mitigation measures for these cumulatively considerable impacts are available to the Project that would have a proportional nexus to the Project’s traffic impact to these facilities.</p>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
		<p>On page 4.14-41 in EIR subsection 4.14.11, <i>Significance of Impacts After Mitigation</i>, the discussion of the discussion of the Project’s cumulatively considerable impacts to Intersections #3, #5, and #38 under the Horizon Year (2040) Conditions scenario was modified to incorporate a reference to implementation of the newly added Mitigation Measure MM 4.14-4. This paragraph was revised as follows:</p> <p>As shown in Table 4.14-14, <i>Intersection Analysis for Horizon Year (2040) Conditions with Improvements</i>, all intersections in the Project study area would operate at acceptable LOS with recommended improvements. Implementation of the improvements required by Mitigation Measure MM 4.14-2 would reduce the Project’s cumulatively considerable impacts to Intersection #21 to levels that are less than cumulatively considerable (as shown in Table 4.14-14). The Project would result in cumulatively considerable impacts to Intersections #3, #5, #18, #20, #22, and #38 under the Horizon Year (2040) conditions scenario. Intersections #3 and #5 are located outside of the geographic limits of the City of Colton. Because there is no funding mechanism available for development projects to contribute toward the construction of needed improvements located outside of the geographic limits of the City of Colton (<u>including the improvement to Intersections #3 and #5 stated in Mitigation Measure MM 4.14-4, and improvements to Intersection #38 stated in Mitigation Measure MM 4.14-5</u>), the Project’s cumulatively considerable impacts to Intersections #3 and #5 would be significant and unavoidable. Because the improvements to Intersections #18, #20, and #22 that are listed in Mitigation Measure MM 4.14-3 are not part of an established City of Colton fee program, there is no assurance that the improvements will be implemented at their time of need. Therefore, the Project’s cumulatively considerable impacts to Intersections #18, #20, and #22 would be unavoidable. No other feasible mitigation measures for these cumulatively considerable impacts are available to the Project that would have a proportional nexus to the Project’s traffic impact to these facilities.</p>
7-8	7.3.2	<p>In order to respond to Comment A-8 issued by DTSC, two (2) Phase I Environmental Site Assessment reports were added to the administrative record. The following two references were added to EIR Section 8.0, <i>References</i>:</p> <p><u>LAI, 2014b. Leighton and Associates, Inc. (LAI). 2014b. <i>Phase I Environmental Site Assessment, Roquet Ranch, Northwest and Southeast of 2699 Maryknoll Drive, APNs 1167-021-05, 1167-</i></u></p>



Table F-2 Errata Table of Additions, Corrections, and Revisions

PAGE(S)	SECTION	ADDITIONS, CORRECTIONS, AND REVISIONS
		<p><u>021-21, and Portions of 1167-011-01 and 1167-021-01, City of Colton, San Bernardino County, California. Dated October 13, 2014.</u></p> <p><u>LAI. 2015b. Phase I Environmental Site Assessment, Roquet Ranch, 9-Acre Parcel North of Center Street and Orange Street, APNs 1167-021-23 and a Portion of 1167-021-22, City of Colton, San Bernardino County, California. Dated June 18, 2015.</u></p>

Additionally, Table 4.0-1 has been updated to include additional details regarding cumulative projects that were considered in the cumulative project analyses for each issue area throughout the DEIR. While additional details regarding each cumulative project have been provided to clarify the location and nature of the project, no new cumulative projects were added to Table 4.0-1. The replacement Table 4.0-1 is provided below.

Table 4.0-1 Cumulative Projects List

#	Project/Location	Land Use	Quantity	Units
CITY OF COLTON				
COL1	CUSM Campus (300 N. Pepper Av.) File No.: DAP-001-233	Medical College	150	STU
COL2	City Hub Center (1601 W. Valley Blvd.) 7.26 acres File No.: DAP-	Hotel	NA	RM
		Gas Station	NA	VFP
COL3	Howard Industries (1600 Agua Mansa Road) 42.67 acres File No.: DAP-001-390	Warehouse	805.500	TSF
COL4	Cal-Med Surgery Center (1281 W. C St.) 2.18 acres File No.: DAP-001-240	Medical Office	NA	TSF
COL5	Valley Orange Ent. Chevron Redevelopment (1600 W. Valley Blvd.) 1.82 acres File No.: DAP-001-362	Service Station	8	VFP
COL6	Ostoich Diesel Service, Diesel injection (1610 Fairway Dr.) 1.9 acres File No.: DAP-001-268	Auto Shop	1.350	TSF
COL7	New Juan Colorado Family Restaurant (195 W. Valley Bl.) 27,050 s.f. File No.: DAP-001-428	Restaurant	NA	TSF
COL8	Commercial building (1175 S. Mt. Vernon Av.) 104,000 s.f. building	Commercial	104.000	TSF
COL9	Used car lot (495 W. Valley Bl.) 6,500 s.f. File No.: DAP-001-165	Church	NA	Seats
COL10	Smart & Final Extra (1023 N. Mt. Vernon) 27,870 s.f. File No.: DAP-001-249	Discount Super Store	27.870	TSF
		Fast Food w/ Drive-Thru	4.400	TSF
COL11	Assisted Living Extension (839 Fairway Dr.) 61,400 s.f. File No.: DAP-001-413	Assisted Living and Memory Care Facility	103	Beds
COL12	Cap Rock Partners warehouse with office space (1601 Fairway Dr.) 178,980 s.f. File No.: DAP-001-262	Industrial	178.980	TSF
COL13	Medical Office (1550 E. Washington St.) 9,000 s.f.	Church	120	Seats
COL14	Warehouse, Office and Manufacturing facility (1559 Steel Rd.) 4.09 acres File No.: DAP-001-297	Industrial	60.000	TSF
COL15	Steel Road Industrial Building (1603 Steel Rd.) 4.09 acres File No.: DAP 001-188	Industrial	159.271	TSF



Table 4.0-1 Cumulative Projects List

#	Project/Location	Land Use	Quantity	Units
COL16	Recycling facility (785 E. M Street)	Metal Building	20.600	TSF
COL17	Colton Iron Metal (790 E. M St.) 3.63 acres File No.: DAP-000-881 and DAP-001-023	Recycling Center	3.630	AC
COL18	Single family residential (644-660 Laurel Lane) approximately 5 homes	SFDR	5	DU
COL19	CF Equipment (1200 Jefferson Ln.) 71,891 s.f. File No.: DAP-001-234	Office	NA	TSF
COL20	Southwest Regional Operations Center (602 Agua Mansa Rd.) 19,913 s.f. File No.: DAP-001-230	Trucking Facility	19.919	TSF
COL21	Tire store (1395 Washington St.)	Tire Store	NA	TSF
COUNTY OF RIVERSIDE				
RIVCO1	TR28957 8.86 acres to be divided into 37 dwelling units with a minimum lot size of 7,200 s.f.	Single-Family Residential	37	DU
RIVCO2	TR32989 10.01 acres to be divided into 27 dwelling units with a minimum lot size of 7,200 s.f.	Single-Family Residential	27	DU
RIVCO3	TR32291 27.13 acres to be divided into 69 dwelling units with a minimum lot size of 7,200 s.f.	SFDR	69	DU
RIVCO4	CUP03718 40,611 s.f. industrial building containing offices shop space, parts and storage area.	Light Industrial	19.988	TSF
RIVCO5	Economy Melteades, PP24798, 2-story building with retail and offices and laundromat facility.	Retail	2.400	TSF
		Offices	3.405	TSF
		Laundromat	2.961	TSF
RIVCO6	PP25482 Develop 2 general office buildings. Approved November 5, 2015.	General Office	2.632	TSF
RIVCO7	Truck Sales Facility (PP25505) with 1,952 s.f. office, 6,000 s.f. storage area and 900 s.f. display area. Approved April 20, 2015.	Office	1.952	TSF
		Storage	6.000	TSF
RIVCO8	TR36668 (Bixby Highgrove) 65.2 acres to be divided into 200 dwelling units with a minimum lot size of 7,200 s.f. and include three water quality basins, two park sites, and eleven open space lots.	Single-Family Residential	200	DU
RIVCO9	Spring Mountain Ranch (SP 323) (PM36448; TR29597; TR29598; TR29600; TR29741; TR30908; TR30909) 792 acres of mixed use with the following uses: 1,461 dwelling units, school, institutional use, neighborhood commercial, public facilities, and open	Single-Family Residential	1,461	DU
		Elementary School	750	STU
		Day Care Center	4.000	TSF
		Commercial Retail	104.000	TSF
CITY OF GRAND TERRACE				
GT1	SA-14-03 1 single-family residential property on .36 acres. Approved by the Planning Commission on November 3, 2016.	Single-Family Residential	1	DU
GT2	TT18071 (Karger Pico Tract) 8.26 acres to be divided into 17 single-family lots. Approved June 8, 2006.	Single-Family Residential	17	DU
GT3	SA 13-05 1-acre site to construct 66 parking lot spaces. Approved February 24, 2014.	SFDR	1	DU
GT4	Site and Architectural Review 12-04, .78-acres proposes to construct 12 attached two-story dwelling units. Approved December 18, 2013.	Townhomes	12	DU
GT5	Grand Terrace Town Square Master Plan, 20.83 acres. Approved July 2010.	Commercial Retail	209.611	TSF
		Retail	65.730	TSF



Table 4.0-1 Cumulative Projects List

#	Project/Location	Land Use	Quantity	Units
GT6	SA 14-05; SA14-07 1 two-story single-family residential property on .626 acres. Approved by the Planning Commission on November 3, 2016.	SFDR	1	DU
	SA 14-06 1 single-family residential property on .36 acres. Approved by the Planning Commission on November 3, 2016.	SFDR	1	DU
GT7	Barton Plaza Commercial Center (Phase 2), 10,581 s.f. grocery store and 5,400 s.f. restaurant and retail building. Approved July 14, 2011.	Commercial Center	16.251	TSF
GT8	SA 15-01, .52-acre project to construct new Starbucks retail store.	Commercial	1.800	TSF
GT9	SA 15-06 ACUP15-07 E15-08 Develop medical office on a 20,000 s.f. lot. Approved June 2, 2016.	Medical Office	2.870	TSF
GT10	SA 15-07 E15-09, 1,800 s.f. Project to remodel a hair salon. Approved November 19, 2015.	Commercial Hair Salon	1.800	TSF
GT11	SA 15-04 E15-07 Establish a pallet business on 3.7 acres with 6,420 s.f. for office space, 2,400 s.f. metal shop, and four work canopies	Office/Shop	8.800	TSF
GT12	SA 15-05; ACUP15-06; V15-02, 4.09-acre Project to develop two 270 s.f. modular office units and one 192 s.f. truck storage trailer. Approved December 17, 2015.	Office	1.400	TSF
GT13	TTM 15-01; SA 15-03; E15-05 Develop 12 single-family residential property. Approved September 3, 2015.	SFDR	12	DU
GT14	SA05-19-A1; E15-06 Develop 35 detached condominiums. Approved on September 17, 2015.	Condo/Townhomes	35	DU
CITY OF RIALTO				
RIA1	Panattoni I-10 (Cactus Av. & El Rivino Rd.) Develop 2 warehouse building that are 1.26 million and 1.21 million s.f. in size. PPD2642	Warehouse	2,475.745	TSF
RIA2	CapRock III 525,110 s.f. warehouse on 24.37 acres of land.	Warehouse	582.000	TSF
RIA3	Newmark Merrill Companies (Riverside Av.) Shopping center. PPD 2102R and CDP 595-597	Discount Super Store	198.000	TSF
		Tire Store	9.861	TSF
		Retail	25.436	TSF
		Fast Food w/ Drive-Thru	5.484	TSF
RIA4	Kore Infrastructure (Riverside Av. and Aline Ranch Road) PPD2364	Biosolids Facility	288	TPD
CITY OF RIVERSIDE				
R1	P09-0749 Rezoning of 72 acres with business office park, industrial buildings and single-family residential to industrial land uses.	Industrial	54.22	AC
R2	TR34908 (P06-0782) Divide 3.38 vacant acres to 14 single-family residential lots.	Single-Family Residential	14	DU
R3	TR33550(P05-0269;P08-0416) Divide 2.01 vacant acres into 9 single-family residential lots.	Single-Family Residential	9	DU
R4	Adult Day Care Facility (P09-0612) 7.6 acres. Approved December 15, 2009	Adult DayCare	39	STU
R5	Hunter Park Metrolink Station (P11-0329;P11-0330;P11-0332) 408,343s.f. Approved December 11, 2012	Metrolink train station and parking lot	600.00	Spaces
R6	New Car Wash and Service Station (P10-0685; P10-0794) 27,579 s.f. Approved May 24, 2011.	Gas Station & Car Wash	16	VFP
R7	CUP change of use from office to church (P10-0733) 153,177 s.f. Approved March 1, 2011.	Church	598	Seats



Table 4.0-1 Cumulative Projects List

#	Project/Location	Land Use	Quantity	Units
R8	Add store and car wash to gas stations (P09-0419; P10-0476) 33,750 s.f. Approved March 8, 2011.	Gas Station & Car Wash	16	VFP
R9	Apartment complex (P14-0183_ 125 dwelling units on 2.52 acres. Approved January 26, 2015	Apartments	125	DU
R10	Mixed use apartment complex (P06-0028; P06-0029; P06-0031) 95,000 s.f. Approved June 10, 2008.	Condos	205	DU
		Hotel	125	DU
		Commercial	31.600	TSF
R11	6-story building with garage (P09-0835; P10-0002) .82-acres. Approved April 27, 2010.	Office with Parking Structure	132.136	TSF
R12	GPA for public park (P10-0454) 351 acres. Approved May 17, 2011	Public Park	43.64	AC
R13	TR36516 Develop 7 single-family residential lots and a cul-de-sac(P12-0799;P12-0800) 1.26 acres. Approved April 3, 2014.	Single-Family Residential	7	DU
R14	Jacobs Medical Office (P06-1237) 4.2 acres. Approved October 7, 2008.	Medical Office	65.281	TSF
R15	Office building to replace security building (P14-0315; P14-0437) 3,150 s.f. Approved August 26, 2014.	Security Operations Building	3.150	TSF
R16	Bus Storage Yard (P10-0212; P10-0213) 4.38 acres. Approved December 17, 2013	School Bus Storage Yard	4.38	AC
R17	MCUP to convert house into Bed and Breakfast (P13-0650; P13-0651) 9,883 s.f. Approved December 31, 2013.	Bed and Breakfast	3.650	TSF
R18	CUP for material processing center (P14-0132) 2.3 acres. Approved June 19, 2014.	Metal Processing Facility	30.324	TSF
R19	RTA bus storage facility (P09-0530; P09-0531) 129,000s.f. Approved February 2, 2010.	RTA Bus Storage	2.60	AC
R20	CUP for church in BMP zone (P11-0545) 27,878 s.f. Approved November 1, 2011.	Church	80	Seats
R21	Rezoning of 31 properties (P12-0336). Approved October 22, 2013.	Mixed Use Urban	17.80	AC
R22	4-story senior housing (P09-0808; P08-0809) 139,720s.f. Approved June 14, 2011.	Senior Housing	134	Beds
R23	55-unit apartment building (P09-0717; P09-0718) 86,676s.f. Approved April 6, 1020.	Apartments	55	DU
R24	CUP for indoor rock climbing gym (P07-1161) 121,000s.f. Approved January 15, 2008.	Health/Fitness Club	5.580	TSF
R25	Abandon senior facility for low-income apartments (P13-0087; P13-0262) 48,420s.f. Approved May 5, 2015.	Senior Adult Housing - Attached	67	DU
R26	Revised CUP for apartments (P08-0980; P09-0095) 500,000s.f. Approved April 28, 2009.	Apartments	57	DU
R27	CUP to change retail to residential (P08-0960; P09-0025). Approved May 12, 2009.	Apartments	53.5	DU
R28	CUP for doubling up of student apartments (P09-0125). Approved July 28, 2009.	Apartments	11.5	DU
R29	Hotel development (P15-0535) 17,714s.f. Approved April 19, 2016.	Hotel	239	RM
R30	Townhomes (P15-0653). Application withdrawn January 9, 2017.	Townhomes	NA	DU
R31	Construction of 61 residential lots (P15-0812). Application withdrawn on August 30, 2016.	Residential Condo/Townhouse	61	DU
R32	CUP for Planet Fitness (P16-0011) 467,838s.f. Approved May 19, 2016.	Health/Fitness Club	18.000	TSF



Table 4.0-1 Cumulative Projects List

#	Project/Location	Land Use	Quantity	Units
R33	126-room hotel at University Village (P15-0877; P16-0067) .821 acres. Application withdrawn August 10, 2016.	Hotel	144	RM
R34	Subdivide into 4 parcels of single-family parcels (P16-0016). Approved June 26, 2017.	Single Family Detached	5	DU
R35	Subdivide into 3 Industrial Warehouse parcels (P13-0956; P13-0959; P13-0960; P13-0963; P13-0964 P13-0965; P13-0966) 72.5 acres. Approved October 27, 2015.	Industrial Park	1,461.44	TSF
R36	Rezone of 31 properties (P12-0334). Approved October 22, 2013.	Single Family Detached	2.8	AC
R37	Mission Lofts Apartments off University (P14-0045; P14-0046; P14-0047; P14-0048; P14-0049) 4.69 acres. Approved June 7, 2016.	Apartments	208	DU
R38	Industrial building (P14-1033; P14-1034) 15.9 acres. Application incomplete as of January 8, 2015.	Warehousing	308.000	TSF

F.4 NO RECIRCULATION OF THE DRAFT ENVIRONMENTAL IMPACT REPORT REQUIRED

CEQA Guidelines §15088.5 describes the conditions under which a DEIR that was circulated for public review is required to be re-circulated for additional public review and comment. CEQA Guidelines §15088.5 states that new information added to a DEIR is not significant unless the DEIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:

- a. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- b. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- c. A feasible project alternative or mitigation measure considerably different from the others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.
- d. The DEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

As summarized in Table F-2, Additions, Corrections, and Revisions to the Draft EIR, and based on the comment letters and responses presented in the Responses To Comments (above), there were no public comments or changes to the text or analysis contained in the DEIR that resulted in the identification of any new significant environmental effect or a substantial increase in the severity of an environmental effects that were disclosed in the DEIR. Based on comments received on the DEIR, no revisions to the Project’s mitigation measures were necessary. Additionally, the DEIR was fundamentally and



basically adequate, and all conclusions within the DEIR were supported by evidence provided within the DEIR or the administrative record for the proposed Project. Furthermore, public comment letters on the DEIR did not identify any alternatives to the proposed Project.

Based on the foregoing, additional recirculation of the DEIR is not warranted according to the guidance set forth in §15088.5 of the CEQA Guidelines.

F.5 COMMENTS RECEIVED FOLLOWING THE PUBLIC REVIEW PERIOD

The City of Colton received one (1) DEIR comment letter following the close of the DEIR public review period, which concluded on September 21, 2017. The DEIR comment letter was submitted by the Morongo Band of Mission Indians Tribal Historic Preservation Office and dated December 28, 2017. Although CEQA does not require the inclusion of a formal response to comments received after the public review period in a Final EIR, the City of Colton has elected to provide responses to the comments issued by the commenter in this subsection of the FEIR. No revisions were made to the text, tables and/or exhibits of the DEIR in response to the public comments on the DEIR contained in the DEIR comment letter submitted by the Morongo Band of Mission Indians and dated December 28, 2017. Furthermore, as evidenced by the responses contained in this subsection, none of the comments from the DEIR comment letter submitted by the Morongo Band of Mission Indians identify any new significant environmental effect or a substantial increase in the severity of an environmental effects that were disclosed in the DEIR.



LETTER MO (Page 1 of 5)



MORONGO BAND OF MISSION INDIANS
TRIBAL HISTORIC PRESERVATION OFFICE
12700 PUMARRA RD BANNING, CA 92220
OFFICE 951-755-5025 FAX 951-572-6004

Date: 12/28/2017

Re: Roquet Ranch Specific Plan and Draft Environmental Impact Report

Dear Mr. Suarez,

The Tribal Historical Preservation Office of the Morongo Band of Mission Indians has numerous concerns about the proposed Roquet Ranch development project, the city’s consultation and outreach process, deficiencies in the cultural resources study and analysis, and adverse impacts on tribal cultural resources.

Government-to-Government Consultation

As discussed with the city planning staff, the tribe has not been properly noticed to engage in government-to-government consultation under SB 18 and AB 52. The tribe notified the city in June 2016 regarding noticing requirements to begin meaningful consultation. (Letter attached.)

Significance and Adverse Impacts Evaluation

La Loma Hills and the surrounding area form a landscape significant to the Morongo and other tribal people in the region. Tribal occupation sites, as well as the 1800s villages of Agua Mansa and San Salvador, also demonstrate the long-term importance of this area along the Santa Ana River as habitation sites from prehistoric to historical times.

In general, the developer’s archaeological consulting company has taken a piecemeal approach to the prehistoric cultural resources within and near the project area. This approach is not scientifically justifiable and has been used as a vehicle to degrade the significance of these resources and the direct and indirect adverse impacts on them.

The city should reevaluate the cultural resources element, including engaging an independent consultant not selected by the project proponent to examine these cultural resources and landscape.

The cultural resources report states: The Area of Potential Effects contains 25 prehistoric and historic cultural resource sites, and “the proposed housing development project will impact 15 of the 25 sites discovered on the property. However, the impacts to the sites will not be adverse because they have been evaluated as not significant according to CEQA guidelines” (1.0-2).





LETTER MO (Page 2 of 5)

The draft document outlines a series of past archaeological investigations in the proposed project area. These surveys have continued to discover additional resources, including 11 newly identified ones in the most recent surveys. This history of continual discovery suggests other resources may be present. This history also indicates that archaeologists recorded the resources individually solely for site record-keeping purposes, rather than because of any scientific evidence that these locations are unrelated in time and space. The draft document states that “the primary goal of the research design is to attempt to understand the way in which humans have used the land and resources within the project area through time” (3.0-9). This was not done.

Instead, the draft document states: “Of the 25 cultural resources identified, only two rock art features are listed as significant. It appears that both of these rock art sites will not be impacted. The 15 sites that will be impacted are being evaluated as not significant cultural resources as defined by CEQA guidelines” (2.0-1).

One of these locations alone, CA-SBR-314, contains 15 bedrock milling features with more than 80 milling elements and a rock shelter. These resources would be destroyed under the development plan. CA-SBR-314 and other tribal cultural resources in the development footprint should be avoided as they constitute significant resources in this cultural landscape.

Numerous other milling stations, rock shelters, petroglyphs, pictographs and artifacts such as manos, metates, pottery and a quartzite core have been found in La Loma Hills.

For example, two sites near the Area of Potential Effects are CA-SBR-144 (P-SBR-000144) and CA-SBR-1004 (P-36-001004). CA-SBR-144 was recorded in 1965. The cultural resources survey for the Pellissier Specific Plan Project (2008) states that the site description mentions red pictographs on boulders. It notes: “A pictograph from the site is depicted in Heizer and Clewlow’s *Prehistoric Rock Art of California*. It appears to be a divided sun, consisting of a circle with radiating lines and divided by a single line. Site CA-SBR-144 also mentions in the site record for CA-SBR-1004 ... The record mentions faint red pictographs.” If these pictographs still exist but are faded, technological advances now would allow them to be discovered and recorded. CA-SBR-144 is a prehistoric milling location.

As background, CA-SBR-144 or CA-SBR-100 4 help to demonstrate the varied and extensive prehistoric uses of La Loma Hills as a cultural landscape.

However, just because all these resources were recorded over the past five decades as individual sites upon initial discovery, this does not mean these locations are unconnected to each other or they do not form a larger unified site that is significant under CEQA and eligible for listing on the California Register of Historic Resources. As such adverse impacts on one location will have adverse impacts on the other locations individually and collectively in terms of future CEQA determinations and California Register eligibility. The cultural assessment fails to address this situation.



MO-2 Cont.



LETTER MO (Page 3 of 5)

The city must reevaluate these cultural resources on a wholistic basis, particularly if the city intends to subject them to direct and indirect impacts by wrongly deeming them as not significant.

MO-2 Cont.

The draft document attempts to lay out an argument that the research potential for the individual locations has been exhausted by their recordation and through shovel-test pits (STPs). This limited testing technique can prove the presence of buried cultural deposits but cannot prove their absence at a site. This testing was done with 1/8-inch mesh screening rather than a more thorough 1/16-inch screening. It also appears that no wet screening of the soil or floatation was used to locate subsurface finds.

MO-3

In reviewing past archaeological site records from the area, it is clear that prehistoric artifacts have been removed from the vicinity of the features but were previously present, an indication of the probable existence of buried deposits that will yield research potential. Archaeological studies in Southern California also indicate a probability of subsurface finds near milling features even in the absence of surface finds nearby.

MO-4

One example of the faulty analysis involves the CA-SBR-29038 prehistoric rock shelter. The draft document states: "No surface or subsurface artifact deposits were encountered in association with the feature, suggesting that it was a minimally used hunting or camping area. This prehistoric site has been evaluated as not significant due to lack of artifact content" (5.0-121). This statement is speculative and scientifically unsound. As noted, past archaeological records have documented removal or looting of materials from La Loma Hills so the absence of occupation materials within the rock shelter today is meaningless to the determination of whether indigenous peoples used it as an actual shelter. Also, contrary to the implication of the above quotation, it appears that no STP or other subsurface testing was conducted of this undisturbed site to determine the existence of buried artifacts, according to passages in the cultural resources assessment.

MO-5

The significance analysis in the draft document is faulty under California law and archaeological standards. The draft document notes: "The project is located in an area of high cultural resource sensitivity, as is suggested by known site density and predictive modeling. Sensitivity for cultural resources in a given area is usually indicated by known settlement patterns. In southern San Bernardino County, prehistoric cultural activities centered on environments with accessible food and water near bedrock formations" (2.0-1).

MO-6

Despite this acknowledgement of the potential and likelihood of subsurface deposits, the later analysis ignores this potential of the locations individually or collectively to yield more research data and their significance. These locations qualify under Criteria 4 of the California Register because they have yielded, or may be likely to yield, information important in prehistory or history of Southern California.

Additionally, these locations that form a unified archaeological site qualify under Criteria 1 because they are associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage. These patterns include seasonal natural

MO-7



LETTER MO (Page 4 of 5)

resource procurement and processing, occupation and migration, and settlement of indigenous peoples in the Inland Empire and Southern California during prehistoric times. The cultural resource analysis has failed to address this area of significance.

MO-7 Cont.

Likewise, the cultural resource analysis has not addressed the indirect impacts such as visual impacts on prehistoric sites within the APE and the one-mile radius of the project area. The increased number of people living near these resources because of this development and the increased access also will only add to the problems of vandalism and looting at these locations.

MO-8

The draft document also has not addressed the potential for harm from cumulative impacts. Notably, the nearby by Pellissier Ranch has been the subject of large development proposals. Another nearby project is the proposed Modern Pacific Homes residential development.

MO-9

Confidential Information and Treatment of Resources

We also are concerned that the publication of the draft document may serve to endangered these resources because the photographs in the draft document provide a context for their location despite the city’s obligation to keep these locations confidential.

MO-10

The photographs also indicate the use of chalk or some other substance to outline milling slicks. This practice possibly could harm residue analysis or limit other future techniques that could yield more data, as well as disrespecting the integrity of these tribal cultural resources in general.

MO-11

Mitigation Measures

The proposed mitigation measures were found to be inadequate to Morongo. The tribe is requesting the following requests be incorporated in the FEIR:

Cultural Resources Mitigation Measure 4.4-2 No. 4 states: “During the original cutting of previously undisturbed deposits, the archaeological monitor(s) and Native American monitor shall be on-site, as determined by the consulting archaeologist, to perform periodic inspections of the excavations.”

- The Morongo Band of Mission Indians requests to have Morongo tribal monitors present during all ground-disturbing activities, if this project proceeds.
- Morongo requests that tribal governments through their tribal cultural resource experts along with the consulting archaeologists should make that determination with disputes settled by the lead agency.

MO-12

Cultural Resources Mitigation Measure 4.4-2 No. 6 states: “In the event that previously unidentified cultural resources are discovered (other than isolates and clearly non-significant deposits), the consulting archaeologist shall have the authority to divert or temporarily halt ground disturbance operation in the area of the discovery to allow for the evaluation of



LETTER MO (Page 5 of 5)

potentially significant cultural resources. The archaeologist shall contact the City of Colton Building Official or their designee at the time of discovery. The archaeologist, in consultation with the City of Colton Building Official or their designee, shall determine the significance of the discovered resources.”

- Morongo requests that Native American cultural monitors also should have this authority rather than solely a consultant hired by the project proponent.

Cultural Resources Mitigation Measure MM 4.4-2 No. 7 states: “Any cultural resource material collected during the implementation of the Archeological Monitoring Program and Data Recovery Protocol shall be processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation.”

- Morongo requests an amendment to allow tribal governments to repatriate the materials and for reburial on site with the consent of the land owner.
- Morongo requests that mitigation also should include the sourcing and time testing of obsidian or diagnostic materials found.

Sincerely,

Raymond Huaute
Tribal Historic Preservation Officer
Morongo Band of Mission Indians
Email: rhuaute@morongo-nsn.gov
Phone: (951) 755-5025

CC: mtomich@coltonca.gov



MO-12 Cont.



Morongo Band of Mission Indians Tribal Historic Preservation Office – Comment Letter MO

MO-1:

As detailed in DEIR Subsection 4.4, *Cultural Resources*, as part of the Senate Bill 18 (SB 18) and Assembly Bill 52 (AB 52) consultation processes, the City of Colton sent notification of the proposed Project on June 1, 2016 to the Native American tribes with possible traditional or cultural affiliation to the area that previously requested consultation pursuant to AB 52 requirements, which included the Morongo Band of Mission Indians. The City received responses from the San Manuel Band of Mission Indians and the Agua Caliente Band of Cahuilla Indians. In their response to the City’s notification of the Project, the Agua Caliente Band of Cahuilla Indians deferred to the San Manuel Band of Mission Indians and concluded their participation in the AB 52 consultation on August 25, 2016. The consultation with the San Manuel Band of Mission Indians was concluded on July 25, 2017. Notwithstanding this DEIR Comment Letter, the City did not receive any response from representatives of the Morongo Band of Mission Indians to the notification that was to the tribe on June 1, 2016. The City of Colton has completed mandatory compliance with Public Resources Code § 21074 associated with the environmental review of the proposed Project.

MO-2:

Whereas the commenter primarily references archaeological records data as part of the commenter’s archeological evaluation, the archaeological evidence gathered during the field investigations at the Project site was used to provide the data from which the Cultural Resources Assessment (CRA) report preparer concluded that the research potential for each cultural resource site has been exhausted during in evaluating the significance of each potential archeological resource that would be affected by the Project.

Field testing at cultural resource site SBR-314 consisted of the recordation of one rock shelter and 15 bedrock milling features, a visual inspection for the presence of surface artifacts, and the excavation of 21 shovel test pits (STPs). No surface artifacts were observed within the boundaries of site SBR-314 and all STPs were determined to be negative for the presence of cultural material. The CRA (Smith and Hahnen, 2017) determined that site SBR-314 does not meet the criteria for a significant archeological resource under California Environmental Quality Act (CEQA) guidelines.¹⁹ Any further data analysis would go above and beyond the testing and reporting work that is typically conducted to determine if a site meets the definition of significance under California Public Resources Code (PRC) Section 21083.2(g), and would “only be adding to the current body of knowledge.” In addition, neither SBR-314 nor any other sites within the proposed development footprint have been determined to meet the criteria of a “traditional cultural resource” (TCR). CEQA defines a TCR to be either of the following:

¹⁹ Smith, Brian F. and Jillian L. Hahnen, 2017. *A Cultural Resources Assessment for the Roquet Ranch Project, City of Colton, San Bernardino County, California (Tentative Tract Map No. 19983; APNs 116-701-101, -102, 116-702-101, -105, -121, -122, -123, and 116-703-118)*. Brian F. Smith and Associates, Inc. Unpublished report on file at the City of Colton, Colton, California.



1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - a. Included or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR).
 - b. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Section 5024.1 of the PRC states that a cultural landscape is a TCR if the Traditional Cultural Landscape (TCL) is geographically defined in terms of the size and scope of the landscape, and if it meets the definition of a TCR, as stated in CEQA, Section 21074. As noted above, the TCR must meet the eligibility criteria for the CRHR, which, under Section 5024.1(c), requires that the candidate resource meet any of the following National Register of Historic Places (NRHP) eligibility criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

The commenter states that the Project meets the eligibility criteria under paragraphs (3) and (4) of subdivision (c) of Section 5024.1 (stated above). In order for the commenter to establish that a TCR is present within the boundaries of the Project site, it must first identify the presence of a TCL. Significance evaluations for sites located outside of the Project site boundaries (i.e., SBR-144 and SBR-1004) are not included in the scope of work for the current Project. Under AB 52, in order for SBR-144 or SBR-1004 to be classified as TCRs, they must be evaluated for significance in accordance with the criteria listed in PRC Section 5024.1. Like any other discipline, the commenter must provide substantial evidence as to the existence and significance of a TCR/TCL. The integrity of that resource must also play a large part in the evaluation of that resource. If a resource does not retain sufficient integrity under CEQA, then it cannot be considered significant. No substantial evidence has been provided by the commenter to establish that the archaeological sites within the Project site or its vicinity (SBR-144 or SBR-1004, specifically) meet the minimum threshold to be a TCL or TCR.

MO-3:

The commenter accurately indicates that test excavations “can prove the presence of buried cultural deposits but cannot prove their absence.” The search for buried cultural deposits is the primary reason



for implementing a testing program in relation to the preparation of a CRA, the methods of which follow standard archaeological procedures. STPs are commonly used “to determine site size, boundaries, and general patterns of artifact or feature distribution.”²⁰ Although STPs cannot verify the absence of cultural deposits, STP excavation is the standard archaeological method for determining the presence and subsurface limits of cultural deposits.

In addition, current standard archaeological excavation methods employ the use of screens with one-fourth-inch mesh for larger items and one-eighth-inch mesh for “small bones, seeds, and other tiny items.”²⁰ The smaller one-sixteenth-inch mesh screen is primarily utilized when deposits containing extremely small items are encountered. Because no deposits were encountered, and no small bones, seeds, or other tiny items that would have been collected in the one-eighth-inch screens were recovered, one-sixteenth-inch mesh was not utilized during testing at the Project site.

In regard to the comment that only dry screening was conducted, experiments comparing the efficacy of dry, wet, and flotation screening methods revealed that dry screening was “the most effective, wet-screening less so, and flotation a distant third.”²⁰ Water screening is generally recommended for “processing deposits from coastal middens of mucky (or hard, when dry) clay.”²⁰ In addition, “wet screening is a much more labor-intensive process than dry screening and can damage artifacts.”²¹ Because soils excavated at the Project site did not contain any deposits, nor did the soils possess enough clay content to warrant wet-screening procedures, this method of screening was not used. Similarly, flotation was not used when processing the soils due to the lack of subsurface archaeological features or deposits. While “soils containing microbotanical remains (pollen and phytoliths), macrobotanical items (seeds, nuts, faunal specimens), and other small items including lithic debitage and beads)... may be located throughout the site,” they are most often “concentrated in features reflecting human activities like cooking, tool manufacture, burial, and trash disposal.”²⁰ Because no subsurface concentrations of human activities were encountered at the Project site, flotation techniques were not required to be implemented.

As the results of the testing program did not verify the absence of archaeological material, a significant environmental impact was disclosed in the DEIR associated with the potential that undiscovered archeological material may be encountered during the implementation of the Project. Mitigation Measure MM 4.4-2 was identified in the DEIR and requires the approval and implementation of an Archaeological Monitoring Plan and Discovery and Treatment Plan, which would reduce this impact to less than significant.

MO-4:

The commenter accurately states that prehistoric artifacts are often collected or looted from archaeological sites, and that even those sites with no representative surface artifacts may still possess

²⁰ Hester, Thomas R., Harry J. Shaffer, and Kenneth L. Feder, 2009. *Field Methods in Archaeology*. Routledge (an imprint of the Taylor & Francis Group), New York, New York.

²¹ Burke, Heather, Claire Smith, and Larry J. Zimmerman, 2009. *The Archaeologist's Field Handbook: North American Edition*. AltaMira Press (a division of Rowman & Littlefield Publishers, Inc.), Lanham, Maryland.



a subsurface component. In order to account for the presence of buried archaeological deposits in locations where surface artifacts may have been removed, STPs were excavated at 20 of the 25 cultural resource sites identified within the Project site. All sites subjected to STPs were negative for the presence of subsurface deposits or features. Of the five cultural resource sites that were not tested for subsurface deposits, two (SBR-5110 and SBR-9814/H) had been disturbed to the point where native soils were no longer present, two (SBR-29,036 and SBR-29,038) are located in dedicated open space, and one (SBR-7172/H) is a historic linear feature.

Furthermore, looting of archaeological sites generally consists of the removal of recognized formed artifacts. Artifacts such as lithic production waste are rarely collected because these items do not convey any interest to the public. There is no record of any archaeological site having ever been collected completely, and the commenter does not introduce any substantial evidence that such activities are or have been occurring at the resources identified within the Project site.

MO-5:

Site SBR-29,038 was not tested for subsurface deposits due to the surrounding rocky soil and bedrock and its location in dedicated open space, where it will not be within the physical disturbance area of the proposed Project. The shelter itself does not possess any characteristics, such as evidence of milling features, rock art, hearths, or a skirt (“a slope that contains artifacts because inhabitants threw unwanted materials out the front, downslope and away from the shelter”²¹), that would indicate it had been used prehistorically for anything other than minimal hunting or camping activities, if it were ever used at all. In addition, the rocky soil and bedrock surrounding the shelter do not warrant placement of any STPs. Because no STPs were able to be excavated in the vicinity of SBR-29,038, it is also unlikely that any subsurface deposits are present due to a lack of soil. The rock is also highly exfoliated and deteriorated due to general weathering and is a poor candidate for additional studies. Given that no information regarding the SBR-29,038’s potential prehistoric use was gained during the testing program, and no further studies can be conducted that may yield additional information, SBR-29,038 was determined to not be a significant resource under CEQA criteria.

MO-6:

Whereas the commenter primarily references archaeological records data as part of the commenter’s archeological evaluation, the archaeological evidence gathered during the field investigations at the Project site was used to provide the data from which the CRA report preparer concluded that the research potential for each cultural resource site has been exhausted during in evaluating the significance of each potential archeological resource that would be affected by the Project. Although it is possible that additional data may be available, that data would not substantially improve or change how the cultural resource sites are understood, and would only produce data for data’s sake. In contrast to the commenter’s claims, no subsurface cultural resource deposits were identified within the Project site¹⁹.



MO-7:

The cultural resource sites identified within the Project site are only representative of “seasonal natural resource procurement and processing ...” This classification is supported by the lack of artifacts throughout the Project site. No evidence has been provided that might associate the features with “... occupation and migration, and settlement ...” Sites representative of occupation and settlement generally contain the full spectrum of material culture, often yielding hundreds of thousands of pieces of debitage, several thousand formed artifacts, several thousand grams of faunal materials, multiple subsurface features, and dark rich midden deposits. None of these elements are present within the Project site. In addition, due to a lack of surface artifacts and subsurface deposits associated with the cultural resource sites located within the project, there is no way to chronologically associate the sites or link them in space and time. Due to this lack of association, the cultural resource sites are also not representative of any specific events that may “have made a significant contribution to the broad patterns of California’s history and cultural heritage.”

MO-8:

Visual impacts are only assessed for those cultural resource sites deemed to be significant²¹, and which have culturally sensitive elements that would be affected by the residential development. The only significant cultural resource sites located within the Area of Potential Effect (APE) are SBR-29,034 and SBR-29,037, which are located in an area proposed for open space by the Project. Indirect impacts to the cultural resource sites located in open space within the APE are considered to be less than significant because none of these sites, including SBR-29,034 and SBR-29,037, contain any features or surface artifacts that might be collected.

MO-9:

A discussion of the Project’s potential cumulative impacts to cultural resources (including tribal cultural resources) is contained in Subsection 4.4.5 of the DEIR. The DEIR concluded that the Project would result in less-than-cumulatively considerable impacts to cultural resources after implementation of the required mitigation measures.

MO-10:

The City acknowledges the potential concerns of Native American tribes associated with publication of details regarding cultural resources. However, confidential material (confidential appendices containing resource location maps and other details) was excluded from the Project-specific Cultural Resources Assessment (DEIR *Technical Appendix F1*) that was published as part of the DEIR public review process. The inclusion of the plates depicting the cultural resource sites identified as part of the Project’s Cultural Resources Assessment was necessary to provide the public and decisionmakers with the minimum level of information to sufficiently disclose the Project’s potential impacts on in relation to cultural resources.



MO-11:

Chalk does not affect the results of residue analysis studies as calcium (the main component of chalk) is not an element that is destructive to residues left behind by plant and/or animal remains, nor is it tested for during the study. While high calcium values may skew the results of cation-ratio dating (a technique previously used for dating petroglyphs), there is not currently an “agreement within the rock-varnish community regarding the reliability of C-R dating.”²² “Rocks continually weather by an interaction of chemical and physical processes from the time of their formation,”²² and no studies have indicated that chalk accelerates this process or otherwise alters the integrity of the rock.

MO-12:

Mitigation Measure MM 4.4-2 requires the City to approve and implement an Archaeological Monitoring Plan and Discovery and Treatment Plan that shall include written verification to the City of Colton that a Native American monitor(s) has been retained to be present during the Project’s grading activities. It would be the responsibility of the Lead Agency (City of Colton) to determine which Native American tribes should be present during Native American monitoring, and Mitigation Measure MM 4.4-2 need not specify which Native American tribes are required to be retained to conduct monitoring during the Project’s ground disturbance activities. No revisions to the DEIR are warranted with respect to this comment.

Regarding the commenter’s requests that Native American monitors be involved in the evaluation of inadvertently discovered cultural resources during grading activities and that the monitors are granted the authority to divert or temporarily halt ground disturbance operation in the area of a discovery: As discussed in Subsection F.3, *Additions, Corrections, and Revisions to the Draft EIR*, of this Final EIR, Mitigation Measure MM 4.4-2 has been revised to state that the Native American monitor(s) shall have the authority to divert or temporarily halt ground disturbance operation in the area of the discovery to allow for the evaluation of potentially significant tribal cultural resources. No additional revisions to Mitigation Measure MM 4.4-2 are warranted with respect to this comment.

Regarding the commenter’s request to revise Mitigation Measure MM 4.4-2 to allow the following: (1) Tribal governments to repatriate the cultural resource material collected during the implementation of the Archaeological Monitoring Program and Data Recovery Protocol, and (2) Rebury the material on-site with the consent of the land owner: As discussed in Subsection F.3, *Additions, Corrections, and Revisions to the Draft EIR*, of this Final EIR, Mitigation Measure MM 4.4-2 has been revised to require the City of Colton to consult with the appropriate consulting Native American tribe(s) in determining appropriate treatment for unearthened cultural resources if the resources are prehistoric or Native American in nature. Furthermore, as discussed above in Subsection F.3, *Additions, Corrections, and Revisions to the Draft EIR*, the revised Mitigation Measure MM 4.4-2 requires that the treatment plan be developed and reviewed in consultation with the consulting Native American tribe(s). Accordingly, pursuant to Mitigation Measure MM 4.4-2, in the event that any cultural resources are discovered during ground disturbance activities, such resources shall be evaluated by the

²² R.E. Taylor and Martin J. Aitken, 1997. *Chronometric Dating in Archaeology*. In *Advances in Archaeological and Museum Science 2*. Springer Science+Business Media, New York, New York.



consulting Native American tribe(s) and an appropriate treatment plan shall be developed with consultation from the consulting Native American tribe(s). Therefore, with implementation of the revisions shown in Table F-2, Mitigation Measure MM 4.4-2 provides sufficient opportunity for the consulting Native American tribe(s) to provide input regarding the treatment of any cultural resource materials encountered during the Project's ground disturbance activities. Accordingly, no revisions to Mitigation Measure MM 4.4-2 are warranted with respect to this comment.



ATTACHMENTS



ATTACHMENT A
SUPPLEMENTARY TRAFFIC DATA

October 24, 2017

Mr. Bill Lo
Sunmeadows, LLC
27127 Calle Arroyo, Suite 1910
San Juan Capistrano, CA 92675

SUBJECT: ROQUET RANCH SPECIFIC PLAN FOCUSED TRAFFIC ASSESSMENT

Dear Mr. Bill Lo:

This letter serves as a supplement to the [Roquet Ranch Specific Plan Traffic Impact Analysis](#) (November 30, 2016) (referred to as "SP TIA"). This focused traffic analysis has been prepared in response to the City of Grand Terrace's comments, dated September 21, 2017. The City's comments are provided in Attachment A.

Specifically, this focused traffic assessment evaluates the intersections of Vivienda Avenue at Barton Road and Canal Street at Barton Road. Michigan Avenue is proposed to be realigned with Vivienda Avenue as part of the I-215 Freeway and Barton Road Interchange Project. Canal Street and Barton Road is a Congestion Management Program (CMP) monitored intersection. In addition, the intersection of La Crosse Avenue / I-215 SB Ramp at Barton Road has been evaluated with a roundabout for Existing and Existing Plus Project (E+P) traffic conditions. The roundabout is being constructed as part of the I-215/Barton Road interchange improvements. The SP TIA includes evaluation of the roundabout under Opening Year Cumulative (2020) and Horizon Year (2040) traffic conditions.

SUMMARY OF FINDINGS

Peak hour operations analysis for the intersections of Vivienda Avenue at Barton Road and Canal Street at Barton Road indicates that the intersections would operate at acceptable levels of service (LOS) during the peak hours for all analysis scenarios. The proposed intersection improvements with the realignment of Michigan Avenue at Vivienda Avenue has been assumed for the analysis of Opening Year Cumulative (2020) and Horizon Year (2040) traffic conditions. As such, although the Project contributes 50 or more peak hour trips to these intersections, the Project's impact at these locations are less than significant.

Peak hour roundabout operations analysis for the intersection of La Crosse Avenue / I-215 SB Ramp at Barton Road indicates that the intersection would operate at acceptable LOS during the peak hours with under Existing and E+P traffic conditions.

PROJECT OVERVIEW

For the purposes of this focused traffic assessment, the Project trip generation and trip distribution patterns utilized at the study area intersections are consistent with those previously presented in the SP TIA.

EXISTING TRAFFIC COUNTS

Existing traffic counts were conducted at the intersections of Vivienda Avenue at Barton Road and Canal Street at Barton Road in October 2017 for the purposes of this focused traffic assessment. The existing traffic count worksheets are provided Attachment B. Traffic volumes from the SP TIA was used for the analysis of intersection La Crosse Avenue / I-215 SB Ramp at Barton Road with a roundabout.

INTERSECTION OPERATIONS ANALYSIS

The peak hour operations analysis assumes the existing lane geometrics that are currently in place today. However, improvements consistent with those proposed as part of the I-215 Freeway/Barton Road interchange have assumed to be in place for Opening Year Cumulative (2020) and Horizon Year (2040) traffic conditions.

As shown in Table 1, the intersections of Vivienda Avenue at Barton Road and Canal Street at Barton Road are shown to operate at an acceptable LOS during the peak hours for all analysis scenarios. The Project is anticipated to contribute 50 or more peak hour trips to both of these intersections. However, the addition of Project traffic to these intersections is not anticipated to result in a peak hour deficiency. As such, the Project's impact to these study area intersections is less than significant.

The intersection of La Crosse Avenue / I-215 SB Ramp at Barton Road is shown to operate at an acceptable LOS during the peak hours with a roundabout under Existing and E+P traffic conditions.

Analysis worksheets for all analysis scenarios are provided in Attachment C.

If you have any questions, please contact me directly at (949) 336-5982.

Respectfully submitted,

URBAN CROSSROADS, INC.



Charlene So, PE
Senior Associate



Pranesh Tarikere, PE
Senior Engineer

Table 1

Summary of Intersection Analysis

#	Intersection	Traffic Control ³	Intersection Approach Lanes ¹												Delay ² (secs.)		Level of Service		
			Northbound			Southbound			Eastbound			Westbound			AM	PM	AM	PM	
			L	T	R	L	T	R	L	T	R	L	T	R					
1	Vivienda Av. & Barton Rd.																		
	<i>Existing (2017)</i>	CSS	0	0	0	0	1	0	1	2	0	0	2	0	16.1	12.1	C	B	
	<i>E+P (Project Buildout)</i>	CSS	0	0	0	0	1	0	1	2	0	0	2	0	16.7	12.7	C	B	
	<i>Opening Year (2020) Without Project⁴</i>	TS	<u>2</u>	<u>1</u>	<u>1</u>	<u>1</u>	1	0	1	2	0	<u>1</u>	2	0	33.0	27.0	C	C	
	<i>Opening Year (2020) With Project⁴</i>	TS	<u>2</u>	<u>1</u>	<u>1</u>	<u>1</u>	1	0	1	2	0	<u>1</u>	2	0	33.9	27.7	C	C	
	<i>Horizon Year (2040) Without Project⁴</i>	TS	<u>2</u>	<u>1</u>	<u>1</u>	<u>1</u>	1	0	1	2	<u>1</u> >	<u>1</u>	2	0	53.1	52.3	D	D	
	<i>Horizon Year (2040) With Project⁴</i>	TS	<u>2</u>	<u>1</u>	<u>1</u>	<u>1</u>	1	0	1	2	<u>1</u> >	<u>1</u>	2	0	54.5	54.3	D	D	
2	Canal St. & Barton Rd.																		
	<i>Existing (2017)</i>	TS	0	1	0	1	1	0	1	2	0	1	2	d	11.9	9.9	B	A	
	<i>E+P (Project Buildout)</i>	TS	0	1	0	1	1	0	1	2	0	1	2	d	12.0	10.2	B	B	
	<i>Opening Year (2020) Without Project</i>	TS	0	1	0	1	1	0	1	2	0	1	2	d	12.2	11.3	B	B	
	<i>Opening Year (2020) With Project</i>	TS	0	1	0	1	1	0	1	2	0	1	2	d	12.3	11.8	B	B	
	<i>Horizon Year (2040) Without Project</i>	TS	0	1	0	1	1	0	1	2	0	1	2	d	13.1	17.3	B	B	
	<i>Horizon Year (2040) With Project</i>	TS	0	1	0	1	1	0	1	2	0	1	2	d	13.3	17.9	B	B	
26	La Crosse Av./I-215 SB On-Ramp & Barton Rd.																		
	<i>Existing (2016)</i>	RA	0	1	0	0	<u>1</u>	<u>1</u>	1	1	0	0	<u>1</u>	<u>1</u>	15.4	11.0	C	B	
	<i>E+P Project Buildout</i>	RA	0	1	0	0	<u>1</u>	<u>1</u>	1	1	0	0	<u>1</u>	<u>1</u>	21.2	13.7	C	B	

* **BOLD** = LOS does not meet the applicable jurisdictional requirements (i.e., unacceptable LOS).

¹ When a right turn is designated, the lane can either be striped or unstriped. To function as a right turn lane there must be sufficient width for right turning vehicles to travel outside the through lanes.

L = Left; T = Through; R = Right; > = Right-Turn Overlap Phasing; d= Defacto Right Turn Lane; 1 = Improvement

² Per the 2010 Highway Capacity Manual, overall average intersection delay and level of service are shown for intersections with a traffic signal or all way stop control. For intersections with cross street stop control, the delay and level of service for the worst individual movement (or movements sharing a single lane) are shown.

³ CSS = Cross-street Stop; AWS = All-Way Stop; TS = Traffic Signal; RA = Roundabout

⁴ Improvements shown are consistent with the I-215 Freeway and Barton Road Interchange improvement project.

ATTACHMENT A

CITY OF GRAND TERRACE COMMENT LETTER, DATED SEPTEMBER 21, 2017

ATTACHMENT B

EXISTING (2017) TRAFFIC COUNT WORKSHEETS



LETTER G (Page 1 of 4)



Planning and Development Services Department

Delivered by Electronic Mail

September 21, 2017

Mario Suarez
City of Colton Planning Division
659 N. La Cadena Drive
Colton, CA 92324

Re: Draft Environmental Impact Report – Roquet Ranch Specific Plan
SCH 2016061056

Dear Mr. Suarez:

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) prepared for the Roquet Ranch Specific Plan. The Specific Plan area is adjacent to the City of Grand Terrace and has the potential to create up to 1,050 dwelling units, and to generate a net total of 10,021 trips per day.

G-1

It is anticipated that motorists will utilize Grand Terrace roadways to either enter onto the 215 Interchange at Barton Road or Mount Vernon, or to bypass the Interchange and travel east on Barton Road.

G-2

We have reviewed the Traffic/Transportation Section of the DEIR, which identifies significant impacts to Grand Terrace roadways and intersections, which must be mitigated.

G-3

The DEIR identifies impacts to City intersections located at Michigan Avenue and West Main Street (#36) and Mount Vernon Avenue and Main Street (#38).

Intersection # 38 will worsen from LOS E to LOS F at Opening Year 2020, and Intersection #36 will worsen from LOS E to LOS F at Horizon Year 2040, exacerbating already deficient conditions. The Roquet Ranch Specific Plan Traffic Impact Analysis identifies a fair share contribution in order to mitigate these significant impacts; however, they are not carried over to the DEIR as a mitigation measure. Further, the mitigation recommended in the Roquet Ranch Specific Plan Traffic Impact Analysis may not be adequate, as Grand Terrace includes these intersections in its Circulation Fee Program. This program would require payment of traffic signal impact fees towards signal improvements in the amount of \$283.53 per detached dwelling unit and \$145.57 per attached dwelling unit.

G-4

22795 Barton Road, Grand Terrace, California, 92313-5295 909/824-6621 Fax 909/824-6624



LETTER G (Page 2 of 4)

Comments on Roquet Ranch DEIR
Page 2

The Barton Road Interchange Project is expected to be completed in 2020. The design will extend Commerce Way at its intersection with Michigan Street and extend it east and west to Barton Road, where it will align with Vivienda Avenue to the north. The DEIR should consider this intersection in the 2016, 2020 and 2040 projections and analysis.

G-5

In addition, the attached memorandum identifies areas within the Roquet Ranch Specific Plan Traffic Impact Analysis that require revision; and which may result in alternative recommendations or mitigation measures.

G-6

Should you have any questions or require additional information, feel free to contact Public Works Director Alan French at (909) 824-6621 ext. 251 or me at (909) 824-6621 ext. 225.

Sincerely,

SANDRA MOLINA
Planning and Development Services Director

G-7

c: Alan French, Public Works Director

LETTER G (Page 3 of 4)



City of Grand Terrace
Memorandum
Public Works Department

DATE: September 21, 2017

TO: Sandra Molina, Planning Director
Planning and Development Services Department

FROM: Alan French, P.E., Director
Public Works Department

SUBJECT: TR 19983 Draft Specific Plan Submittal
Roquet Ranch

City of Grand Terrace Public Works Department has received the following data:

1. Draft Environmental Impact Report for Roquet Ranch Specific Plan dated August 2, 2017, SCH No. 2016061056
2. Roquet Ranch Specific Plan Traffic Impact Analysis dated November 30, 2016

G-8

Public Works has completed the review of the above reference material and has the following comments on the material reviewed:

Provide corrected study and required documentation for review of the proposed project as follows:

- (1) Revised traffic model
- (1) Update DEIR impact mitigations

G-9

All scoping studies for intersections within the City of Grand Terrace should be reviewed and agreed to by the Grand Terrace.

The traffic model needs to include the configurations that are existing or for the opening year, and should consider future intersections that are in process and will be in operation for first occupancies model year of 2020.

Traffic Study Comments:

1. The mitigation recommended by the traffic study needs to be included in the DEIR. However, as noted in the cover letter, the mitigation recommended in the Roquet Ranch Specific Plan Traffic Impact Analysis may not be adequate, as Grand Terrace includes these intersections in its Circulation Fee Program. This program would require payment of traffic

G-10 Cont.



LETTER G (Page 4 of 4)

Memo to Planning Director
Page 2 of 2

signal impact fees towards signal improvements in the amount of \$283.53 per detached dwelling unit and \$145.57 per attached dwelling unit. ↑ G-10 Cont.

2. Additional traffic analysis will be required as individual projects are submitted to ensure mitigation is being implemented and effective. ← G-11

3. Extension of Commerce Way to Taylor not included in model and is under preliminary design at this time. ← G-12

4. New signal at Town Square and Barton Road not included and is a CMP intersection. ← G-13

5. Will Palm and Barton be affected? Only the WB left on Palm movement may be affected. Preston and Barton may have more impact. Same intersection configuration is at Canal and Barton which also is a CMP intersection, but was not considered. ← G-14

6. The Michigan and Barton intersection will be moved to align with Vivienda Avenue and Commerce Way. ← G-15

7. Signal on west side of freeway will be eliminated, need round-a-bout modeled. ← G-16

8. Recommendation #18 of table 1-5 has been completed in table. ← G-17

9. Recommendation #26 of Table 1-5 identifies the round-a-bout, but not used in model. ← G-18

10. Traffic signal Warrant not needed at location #24, 25 of Table 2-3. ← G-19

11. Instead of Palm and Barton, there are closer intersections that would get more impact to justify a warrant analysis. ← G-20

12. Analysis of Michigan and Main addressed school am peak. Signal also at main and school entrance. ← G-21

Specific Plan Comments: ← G-22

1. Traffic Model mitigation recommendations not proposed in the DEIR. ←

2. Requirement for fair share provided in analysis but not implemented in DEIR. ← G-23

Should you have any questions or require additional information, please do not hesitate to contact me at x251. ← G-24

ATTACHMENT C

INTERSECTION OPERATIONS ANALYSIS WORKSHEETS

INTERSECTION TURNING MOVEMENT COUNTS

PREPARED BY: AimTD LLC. tel: 714 253 7888 cs@aimtd.com

DATE:
Thu, Oct 19, 17

LOCATION: Grand Terrace
NORTH & SOUTH: Vivienda
EAST & WEST: Barton

PROJECT #: SC
LOCATION #: 1
CONTROL: SIGNAL

NOTES:

Queue WB AM

AM	▲ N	E ▶
PM		
MD	◀ W	S
OTHER		
OTHER	▼	▶

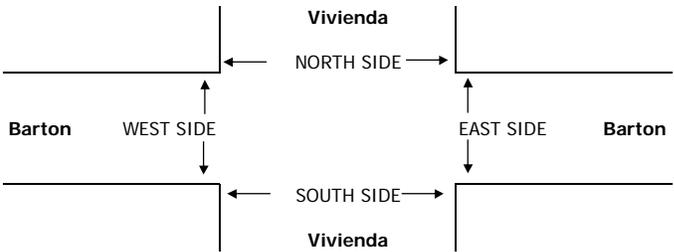
Add U-Turns to Left Turns

LANES:	NORTHBOUND <small>Vivienda</small>			SOUTHBOUND <small>Vivienda</small>			EASTBOUND <small>Barton</small>			WESTBOUND <small>Barton</small>			TOTAL
	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	
	X	X	X	0	X	0	1	2	X	X	2	0	

U-TURNS				
NB	SB	EB	WB	TTL
0	0	0	0	0

	NORTHBOUND <small>Vivienda</small>			SOUTHBOUND <small>Vivienda</small>			EASTBOUND <small>Barton</small>			WESTBOUND <small>Barton</small>			TOTAL
	NL	NT	NR	SL	ST	SR	EL	ET	ER	WL	WT	WR	
AM													
7:00 AM	0	0	0	0	0	20	29	94	0	0	149	9	301
7:15 AM	0	0	0	5	0	60	77	119	0	0	186	5	452
7:30 AM	0	0	0	5	0	43	38	121	0	0	205	7	419
7:45 AM	0	0	0	6	0	17	7	140	0	0	151	3	324
8:00 AM	0	0	0	0	0	6	12	87	0	0	138	4	247
8:15 AM	0	0	0	2	0	19	36	105	0	0	115	7	284
8:30 AM	0	0	0	5	0	30	4	103	0	0	117	2	261
8:45 AM	0	0	0	2	0	2	1	101	0	0	83	1	190
VOLUMES	0	0	0	25	0	197	204	870	0	0	1,144	38	2,483
APPROACH %	0%	0%	0%	11%	0%	88%	19%	81%	0%	0%	97%	3%	
APP/DEPART	0	/	243	223	/	0	1,077	/	896	1,183	/	1,344	0
BEGIN PEAK HR	7:00 AM												
VOLUMES	0	0	0	16	0	140	151	474	0	0	691	24	1,498
APPROACH %	0%	0%	0%	10%	0%	90%	24%	76%	0%	0%	97%	3%	
PEAK HR FACTOR	0.000			0.600			0.800			0.843			0.829
APP/DEPART	0	/	175	156	/	0	627	/	490	715	/	833	0
PM													
4:00 PM	0	0	0	2	0	5	2	146	0	0	113	2	270
4:15 PM	0	0	0	1	0	6	6	137	0	0	134	2	286
4:30 PM	0	0	0	0	0	2	6	157	0	0	134	4	303
4:45 PM	0	0	0	2	0	4	12	160	0	0	134	1	313
5:00 PM	0	0	0	2	0	3	6	175	0	0	148	3	337
5:15 PM	0	0	0	1	0	5	11	156	0	0	146	3	322
5:30 PM	0	0	0	4	0	3	9	185	0	0	157	5	363
5:45 PM	0	0	0	2	0	4	7	164	0	0	140	2	319
VOLUMES	0	0	0	14	0	32	59	1,280	0	0	1,106	22	2,518
APPROACH %	0%	0%	0%	30%	0%	70%	4%	95%	0%	0%	98%	2%	
APP/DEPART	0	/	81	46	/	0	1,343	/	1,295	1,129	/	1,142	0
BEGIN PEAK HR	5:00 PM												
VOLUMES	0	0	0	9	0	15	33	680	0	0	591	13	1,342
APPROACH %	0%	0%	0%	38%	0%	63%	5%	95%	0%	0%	98%	2%	
PEAK HR FACTOR	0.000			0.857			0.920			0.932			0.924
APP/DEPART	0	/	46	24	/	0	714	/	689	604	/	607	0

NB	SB	EB	WB	TTL
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	2	0	2
0	0	0	1	1
0	1	0	0	1
0	0	1	0	1
0	0	0	0	0
0	1	3	1	5
0	0	3	1	4
0	0	0	0	0
0	0	0	0	0
0	0	1	0	1
0	0	0	0	0
0	0	0	0	0
0	0	0	0	0
0	0	4	1	5

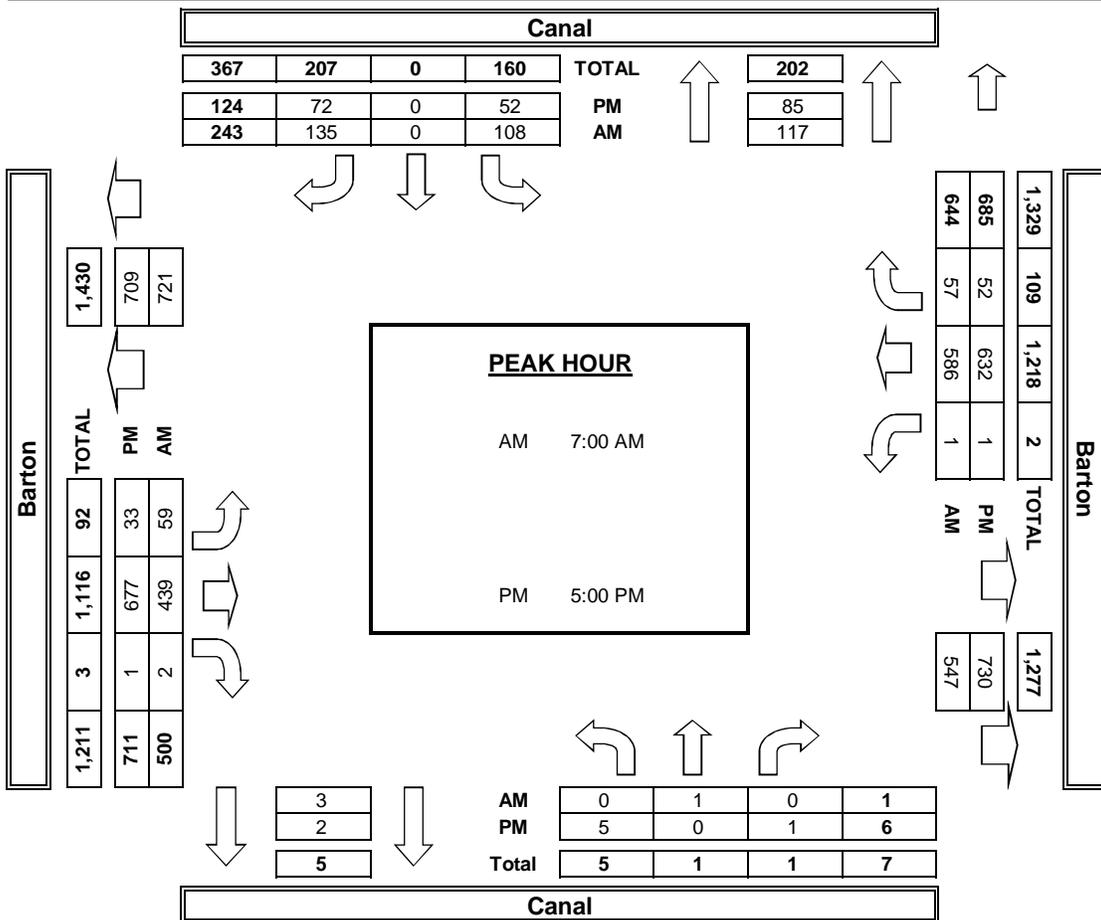
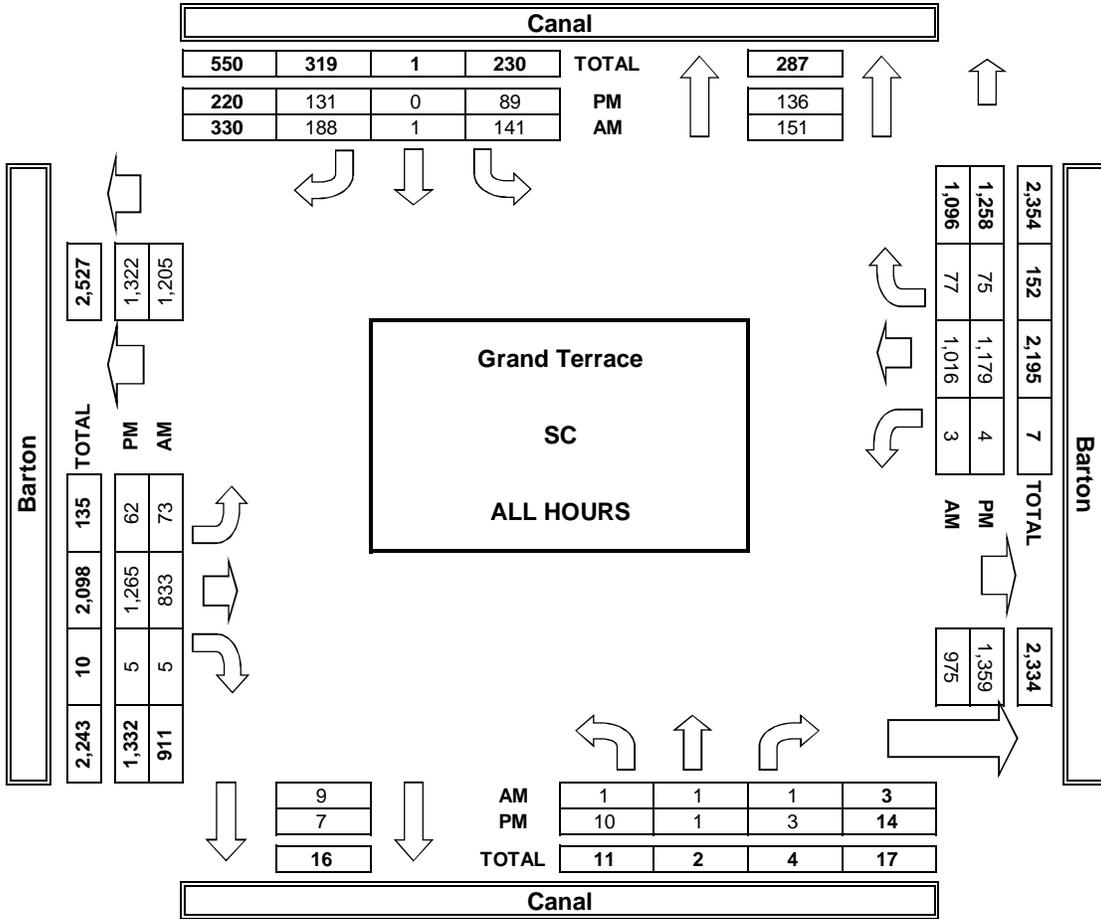


	PEDESTRIAN + BIKE CROSSINGS				
	N SIDE	S SIDE	E SIDE	W SIDE	TOTAL
AM					
7:00 AM	0	0	0	0	0
7:15 AM	0	0	0	0	0
7:30 AM	0	0	0	0	0
7:45 AM	0	0	0	0	0
8:00 AM	0	0	0	0	0
8:15 AM	0	0	0	0	0
8:30 AM	0	0	0	0	0
8:45 AM	0	0	0	0	0
TOTAL	0	0	0	0	0
PM					
4:00 PM	0	0	0	0	0
4:15 PM	0	0	0	0	0
4:30 PM	0	0	0	0	0
4:45 PM	0	0	0	0	0
5:00 PM	0	0	0	0	0
5:15 PM	0	0	0	0	0
5:30 PM	0	0	0	0	0
5:45 PM	0	0	0	0	0
TOTAL	0	0	0	0	0

	PEDESTRIAN CROSSINGS				
	N SIDE	S SIDE	E SIDE	W SIDE	TOTAL
AM					
7:00 AM	0	0	0	0	0
7:15 AM	0	0	0	0	0
7:30 AM	0	0	0	0	0
7:45 AM	0	0	0	0	0
8:00 AM	0	0	0	0	0
8:15 AM	0	0	0	0	0
8:30 AM	0	0	0	0	0
8:45 AM	0	0	0	0	0
TOTAL	0	0	0	0	0
PM					
4:00 PM	0	0	0	0	0
4:15 PM	0	0	0	0	0
4:30 PM	0	0	0	0	0
4:45 PM	0	0	0	0	0
5:00 PM	0	0	0	0	0
5:15 PM	0	0	0	0	0
5:30 PM	0	0	0	0	0
5:45 PM	0	0	0	0	0
TOTAL	0	0	0	0	0

	BICYCLE CROSSINGS				
	NS	SS	ES	WS	TOTAL
AM					
7:00 AM	0	0	0	0	0
7:15 AM	0	0	0	0	0
7:30 AM	0	0	0	0	0
7:45 AM	0	0	0	0	0
8:00 AM	0	0	0	0	0
8:15 AM	0	0	0	0	0
8:30 AM	0	0	0	0	0
8:45 AM	0	0	0	0	0
TOTAL	0	0	0	0	0
PM					
4:00 PM	0	0	0	0	0
4:15 PM	0	0	0	0	0
4:30 PM	0	0	0	0	0
4:45 PM	0	0	0	0	0
5:00 PM	0	0	0	0	0
5:15 PM	0	0	0	0	0
5:30 PM	0	0	0	0	0
5:45 PM	0	0	0	0	0
TOTAL	0	0	0	0	0

AimTD LLC
TURNING MOVEMENT COUNTS



EXISTING (2017) CONDITIONS

Intersection

Int Delay, s/veh 2.8

Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations	↖ ↗	↗ ↗	↖ ↗		↖ ↗	
Traffic Vol, veh/h	151	474	691	24	16	140
Future Vol, veh/h	151	474	691	24	16	140
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	50	-	-	-	0	-
Veh in Median Storage, #	-	0	0	-	2	-
Grade, %	-	0	0	-	0	-
Peak Hour Factor	83	83	83	83	83	83
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	182	571	833	29	19	169

Major/Minor	Major1	Major2	Minor2
Conflicting Flow All	861	0	1496
Stage 1	-	-	847
Stage 2	-	-	649
Critical Hdwy	4.14	-	6.84
Critical Hdwy Stg 1	-	-	5.84
Critical Hdwy Stg 2	-	-	5.84
Follow-up Hdwy	2.22	-	3.52
Pot Cap-1 Maneuver	776	-	113
Stage 1	-	-	381
Stage 2	-	-	482
Platoon blocked, %	-	-	-
Mov Cap-1 Maneuver	776	-	86
Mov Cap-2 Maneuver	-	-	264
Stage 1	-	-	381
Stage 2	-	-	369

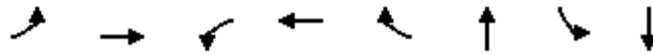
Approach	EB	WB	SB
HCM Control Delay, s	2.7	0	16.1
HCM LOS			C

Minor Lane/Major Mvmt	EBL	EBT	WBT	WBR	SBLn1
Capacity (veh/h)	776	-	-	-	512
HCM Lane V/C Ratio	0.234	-	-	-	0.367
HCM Control Delay (s)	11.1	-	-	-	16.1
HCM Lane LOS	B	-	-	-	C
HCM 95th %tile Q(veh)	0.9	-	-	-	1.7

Timings

2: Driveway/Canal St. & Barton Rd.

10/24/2017



Lane Group	EBL	EBT	WBL	WBT	WBR	NBT	SBL	SBT
Lane Configurations								
Traffic Volume (vph)	59	439	1	586	57	1	108	0
Future Volume (vph)	59	439	1	586	57	1	108	0
Turn Type	Prot	NA	Prot	NA	Perm	NA	Perm	NA
Protected Phases	5	2	1	6		8		4
Permitted Phases					6		4	
Detector Phase	5	2	1	6	6	8	4	4
Switch Phase								
Minimum Initial (s)	5.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.2	9.6	22.2	22.2	14.6	26.6	26.6
Total Split (s)	10.0	23.8	9.6	23.4	23.4	26.6	26.6	26.6
Total Split (%)	16.7%	39.7%	16.0%	39.0%	39.0%	44.3%	44.3%	44.3%
Yellow Time (s)	3.6	4.2	3.6	4.2	4.2	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.6	5.2	5.2	4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lead	Lag	Lag			
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes			
Recall Mode	None	Max	None	Max	Max	None	None	None

Intersection Summary

Cycle Length: 60

Actuated Cycle Length: 47

Natural Cycle: 60

Control Type: Actuated-Uncoordinated

Splits and Phases: 2: Driveway/Canal St. & Barton Rd.



HCM 2010 Signalized Intersection Summary

2: Driveway/Canal St. & Barton Rd.

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	59	439	2	1	586	57	0	1	0	108	0	135
Future Volume (veh/h)	59	439	2	1	586	57	0	1	0	108	0	135
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1667	1765	1800	1667	1765	1765	1700	1765	1800	1667	1765	1800
Adj Flow Rate, veh/h	69	510	2	1	681	66	0	1	0	126	0	157
Adj No. of Lanes	1	2	0	1	2	1	0	1	0	1	1	0
Peak Hour Factor	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	102	1594	6	4	1350	604	0	379	0	430	0	322
Arrive On Green	0.06	0.47	0.47	0.00	0.40	0.40	0.00	0.21	0.00	0.21	0.00	0.21
Sat Flow, veh/h	1587	3425	13	1587	3353	1500	0	1765	0	1262	0	1500
Grp Volume(v), veh/h	69	250	262	1	681	66	0	1	0	126	0	157
Grp Sat Flow(s),veh/h/ln	1587	1676	1762	1587	1676	1500	0	1765	0	1262	0	1500
Q Serve(g_s), s	1.9	4.2	4.2	0.0	6.9	1.2	0.0	0.0	0.0	3.9	0.0	4.1
Cycle Q Clear(g_c), s	1.9	4.2	4.2	0.0	6.9	1.2	0.0	0.0	0.0	4.0	0.0	4.1
Prop In Lane	1.00		0.01	1.00		1.00	0.00		0.00	1.00		1.00
Lane Grp Cap(c), veh/h	102	780	820	4	1350	604	0	379	0	430	0	322
V/C Ratio(X)	0.68	0.32	0.32	0.28	0.50	0.11	0.00	0.00	0.00	0.29	0.00	0.49
Avail Cap(c_a), veh/h	190	780	820	176	1350	604	0	859	0	773	0	730
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	20.7	7.6	7.6	22.5	10.1	8.4	0.0	13.9	0.0	15.5	0.0	15.6
Incr Delay (d2), s/veh	2.9	1.1	1.0	15.6	1.4	0.4	0.0	0.0	0.0	0.4	0.0	1.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.9	2.2	2.3	0.0	3.4	0.6	0.0	0.0	0.0	1.4	0.0	1.8
LnGrp Delay(d),s/veh	23.6	8.7	8.6	38.2	11.5	8.8	0.0	13.9	0.0	15.9	0.0	16.7
LnGrp LOS	C	A	A	D	B	A		B		B		B
Approach Vol, veh/h		581			748			1				283
Approach Delay, s/veh		10.4			11.3			13.9				16.3
Approach LOS		B			B			B				B
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	4.7	26.2		14.3	7.5	23.4		14.3				
Change Period (Y+Rc), s	4.6	5.2		4.6	4.6	5.2		4.6				
Max Green Setting (Gmax), s	5.0	18.6		22.0	5.4	18.2		22.0				
Max Q Clear Time (g_c+I1), s	2.0	6.2		6.1	3.9	8.9		2.0				
Green Ext Time (p_c), s	0.0	5.9		1.3	0.0	4.9		1.4				
Intersection Summary												
HCM 2010 Ctrl Delay			11.9									
HCM 2010 LOS			B									

Intersection									
Intersection Delay, s/veh	15.4								
Intersection LOS	C								
Approach	EB		WB		NB		SB		
Entry Lanes	2		2		1		1		
Conflicting Circle Lanes	2		2		2		2		
Adj Approach Flow, veh/h	334		792		8		365		
Demand Flow Rate, veh/h	386		839		8		402		
Vehicles Circulating, veh/h	778		3		602		833		
Vehicles Exiting, veh/h	360		607		562		9		
Follow-Up Headway, s	3.186		3.186		3.186		3.186		
Ped Vol Crossing Leg, #/h	0		0		0		2		
Ped Cap Adj	1.000		1.000		1.000		1.000		
Approach Delay, s/veh	17.7		15.9		5.0		12.5		
Approach LOS	C		C		A		B		
Lane	Left	Right	Left	Right	Left	Left	Bypass		
Designated Moves	L	TR	LT	R	LTR	LT	R		
Assumed Moves	L	TR	LT	R	LTR	LT	R		
RT Channelized								Yield	
Lane Util	0.008	0.992	0.993	0.007	1.000	1.000			
Critical Headway, s	4.293	4.113	4.293	4.113	4.113	4.113			
Entry Flow, veh/h	3	383	833	6	8	305		97	
Cap Entry Lane, veh/h	630	655	1127	1128	741	631		788	
Entry HV Adj Factor	1.000	0.864	0.943	1.000	1.000	0.878		1.000	
Flow Entry, veh/h	3	331	786	6	8	268		97	
Cap Entry, veh/h	630	567	1063	1128	741	553		788	
V/C Ratio	0.005	0.584	0.739	0.005	0.011	0.484		0.123	
Control Delay, s/veh	5.8	17.8	16.0	3.2	5.0	14.9		5.8	
LOS	A	C	C	A	A	B		A	
95th %tile Queue, veh	0	4	7	0	0	3		0	

Intersection

Int Delay, s/veh 0.4

Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations	↖ ↗	↗ ↗	↖ ↗		↖ ↗	
Traffic Vol, veh/h	33	680	591	13	9	15
Future Vol, veh/h	33	680	591	13	9	15
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	50	-	-	-	0	-
Veh in Median Storage, #	-	0	0	-	2	-
Grade, %	-	0	0	-	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	36	739	642	14	10	16

Major/Minor	Major1	Major2	Minor2
Conflicting Flow All	657	0	328
Stage 1	-	-	649
Stage 2	-	-	441
Critical Hdwy	4.14	-	6.94
Critical Hdwy Stg 1	-	-	5.84
Critical Hdwy Stg 2	-	-	5.84
Follow-up Hdwy	2.22	-	3.32
Pot Cap-1 Maneuver	926	-	668
Stage 1	-	-	482
Stage 2	-	-	616
Platoon blocked, %	-	-	-
Mov Cap-1 Maneuver	926	-	668
Mov Cap-2 Maneuver	-	-	-
Stage 1	-	-	482
Stage 2	-	-	592

Approach	EB	WB	SB
HCM Control Delay, s	0.4	0	12.1
HCM LOS			B

Minor Lane/Major Mvmt	EBL	EBT	WBT	WBR	SBLn1
Capacity (veh/h)	926	-	-	-	531
HCM Lane V/C Ratio	0.039	-	-	-	0.049
HCM Control Delay (s)	9	-	-	-	12.1
HCM Lane LOS	A	-	-	-	B
HCM 95th %tile Q(veh)	0.1	-	-	-	0.2

Timings

2: Driveway/Canal St. & Barton Rd.

10/24/2017



Lane Group	EBL	EBT	WBL	WBT	WBR	NBL	NBT	SBL	SBT
Lane Configurations	↙	↕↗	↙	↕↖	↗		↕↖	↙	↗
Traffic Volume (vph)	33	677	1	632	52	5	0	52	0
Future Volume (vph)	33	677	1	632	52	5	0	52	0
Turn Type	Prot	NA	Prot	NA	Perm	Perm	NA	Perm	NA
Protected Phases	5	2	1	6			8		4
Permitted Phases					6	8		4	
Detector Phase	5	2	1	6	6	8	8	4	4
Switch Phase									
Minimum Initial (s)	5.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.2	9.6	22.2	22.2	14.6	14.6	26.6	26.6
Total Split (s)	10.0	23.8	9.6	23.4	23.4	26.6	26.6	26.6	26.6
Total Split (%)	16.7%	39.7%	16.0%	39.0%	39.0%	44.3%	44.3%	44.3%	44.3%
Yellow Time (s)	3.6	4.2	3.6	4.2	4.2	3.6	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0		0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.6	5.2	5.2		4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lead	Lag	Lag				
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes				
Recall Mode	None	Max	None	Max	Max	None	None	None	None

Intersection Summary

Cycle Length: 60

Actuated Cycle Length: 45.3

Natural Cycle: 60

Control Type: Actuated-Uncoordinated

Splits and Phases: 2: Driveway/Canal St. & Barton Rd.



HCM 2010 Signalized Intersection Summary
 2: Driveway/Canal St. & Barton Rd.

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	33	677	1	1	632	52	5	0	1	52	0	72
Future Volume (veh/h)	33	677	1	1	632	52	5	0	1	52	0	72
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1667	1765	1800	1667	1765	1765	1700	1765	1800	1667	1765	1800
Adj Flow Rate, veh/h	34	691	1	1	645	53	5	0	1	53	0	73
Adj No. of Lanes	1	2	0	1	2	1	0	1	0	1	1	0
Peak Hour Factor	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	62	1614	2	4	1449	648	313	14	34	420	0	280
Arrive On Green	0.04	0.47	0.47	0.00	0.43	0.43	0.19	0.00	0.19	0.19	0.00	0.19
Sat Flow, veh/h	1587	3435	5	1587	3353	1500	834	73	181	1262	0	1500
Grp Volume(v), veh/h	34	337	355	1	645	53	6	0	0	53	0	73
Grp Sat Flow(s),veh/h/ln	1587	1676	1764	1587	1676	1500	1088	0	0	1262	0	1500
Q Serve(g_s), s	0.9	5.6	5.6	0.0	5.7	0.9	0.0	0.0	0.0	0.0	0.0	1.8
Cycle Q Clear(g_c), s	0.9	5.6	5.6	0.0	5.7	0.9	1.8	0.0	0.0	1.2	0.0	1.8
Prop In Lane	1.00		0.00	1.00		1.00	0.83		0.17	1.00		1.00
Lane Grp Cap(c), veh/h	62	788	829	4	1449	648	360	0	0	420	0	280
V/C Ratio(X)	0.55	0.43	0.43	0.27	0.45	0.08	0.02	0.00	0.00	0.13	0.00	0.26
Avail Cap(c_a), veh/h	204	788	829	188	1449	648	792	0	0	844	0	784
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	19.9	7.4	7.4	21.0	8.4	7.0	14.0	0.0	0.0	14.4	0.0	14.6
Incr Delay (d2), s/veh	2.8	1.7	1.6	13.3	1.0	0.2	0.0	0.0	0.0	0.1	0.0	0.5
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.4	2.9	3.0	0.0	2.8	0.4	0.1	0.0	0.0	0.5	0.0	0.8
LnGrp Delay(d),s/veh	22.7	9.1	9.0	34.3	9.4	7.3	14.0	0.0	0.0	14.5	0.0	15.1
LnGrp LOS	C	A	A	C	A	A	B			B		B
Approach Vol, veh/h		726			699			6				126
Approach Delay, s/veh		9.7			9.3			14.0				14.9
Approach LOS		A			A			B				B
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	4.7	25.0		12.5	6.2	23.4		12.5				
Change Period (Y+Rc), s	4.6	5.2		4.6	4.6	5.2		4.6				
Max Green Setting (Gmax), s	5.0	18.6		22.0	5.4	18.2		22.0				
Max Q Clear Time (g_c+I1), s	2.0	7.6		3.8	2.9	7.7		3.8				
Green Ext Time (p_c), s	0.0	6.0		0.5	0.0	5.8		0.5				
Intersection Summary												
HCM 2010 Ctrl Delay			9.9									
HCM 2010 LOS			A									

Intersection									
Intersection Delay, s/veh	11.0								
Intersection LOS	B								
Approach	EB		WB		NB		SB		
Entry Lanes	2		2		1		1		
Conflicting Circle Lanes	2		2		2		2		
Adj Approach Flow, veh/h	411		578		54		401		
Demand Flow Rate, veh/h	434		610		54		410		
Vehicles Circulating, veh/h	595		6		707		605		
Vehicles Exiting, veh/h	326		755		322		11		
Follow-Up Headway, s	3.186		3.186		3.186		3.186		
Ped Vol Crossing Leg, #/h	0		0		0		4		
Ped Cap Adj	1.000		1.000		1.000		0.999		
Approach Delay, s/veh	14.6		9.8		6.1		9.6		
Approach LOS	B		A		A		A		
Lane	Left	Right	Left	Right	Left	Left	Bypass		
Designated Moves	L	TR	LT	R	LTR	LT	R		
Assumed Moves	L	TR	LT	R	LTR	LT	R		
RT Channelized								Yield	
Lane Util	0.009	0.991	0.989	0.011	1.000	1.000			
Critical Headway, s	4.293	4.113	4.293	4.113	4.113	4.113			
Entry Flow, veh/h	4	430	603	7	54	316		94	
Cap Entry Lane, veh/h	723	745	1125	1125	689	740		816	
Entry HV Adj Factor	1.000	0.947	0.947	1.000	1.000	0.972		1.000	
Flow Entry, veh/h	4	407	571	7	54	307		94	
Cap Entry, veh/h	723	705	1065	1125	689	718		815	
V/C Ratio	0.006	0.577	0.536	0.006	0.078	0.427		0.115	
Control Delay, s/veh	5.0	14.7	9.9	3.3	6.1	10.8		5.6	
LOS	A	B	A	A	A	B		A	
95th %tile Queue, veh	0	4	3	0	0	2		0	

E+P CONDITIONS

Intersection

Int Delay, s/veh 2.7

Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Vol, veh/h	151	541	720	24	16	140
Future Vol, veh/h	151	541	720	24	16	140
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	50	-	-	-	0	-
Veh in Median Storage, #	-	0	0	-	2	-
Grade, %	-	0	0	-	0	-
Peak Hour Factor	83	83	83	83	83	83
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	182	652	867	29	19	169

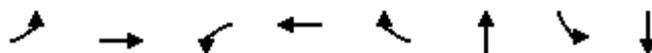
Major/Minor	Major1	Major2	Minor2
Conflicting Flow All	896	0	448
Stage 1	-	-	882
Stage 2	-	-	690
Critical Hdwy	4.14	-	6.94
Critical Hdwy Stg 1	-	-	5.84
Critical Hdwy Stg 2	-	-	5.84
Follow-up Hdwy	2.22	-	3.32
Pot Cap-1 Maneuver	753	-	558
Stage 1	-	-	365
Stage 2	-	-	459
Platoon blocked, %	-	-	-
Mov Cap-1 Maneuver	753	-	558
Mov Cap-2 Maneuver	-	-	-
Stage 1	-	-	365
Stage 2	-	-	348

Approach	EB	WB	SB
HCM Control Delay, s	2.5	0	16.7
HCM LOS			C

Minor Lane/Major Mvmt	EBL	EBT	WBT	WBR	SBLn1
Capacity (veh/h)	753	-	-	-	495
HCM Lane V/C Ratio	0.242	-	-	-	0.38
HCM Control Delay (s)	11.3	-	-	-	16.7
HCM Lane LOS	B	-	-	-	C
HCM 95th %tile Q(veh)	0.9	-	-	-	1.8

Timings

2: Driveway/Canal St. & Barton Rd.



Lane Group	EBL	EBT	WBL	WBT	WBR	NBT	SBL	SBT
Lane Configurations								
Traffic Volume (vph)	59	506	1	615	57	1	108	0
Future Volume (vph)	59	506	1	615	57	1	108	0
Turn Type	Prot	NA	Prot	NA	Perm	NA	Perm	NA
Protected Phases	5	2	1	6		8		4
Permitted Phases					6		4	
Detector Phase	5	2	1	6	6	8	4	4
Switch Phase								
Minimum Initial (s)	5.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.2	9.6	22.2	22.2	14.6	26.6	26.6
Total Split (s)	10.0	23.8	9.6	23.4	23.4	26.6	26.6	26.6
Total Split (%)	16.7%	39.7%	16.0%	39.0%	39.0%	44.3%	44.3%	44.3%
Yellow Time (s)	3.6	4.2	3.6	4.2	4.2	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.6	5.2	5.2	4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lead	Lag	Lag			
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes			
Recall Mode	None	Max	None	Max	Max	None	None	None

Intersection Summary

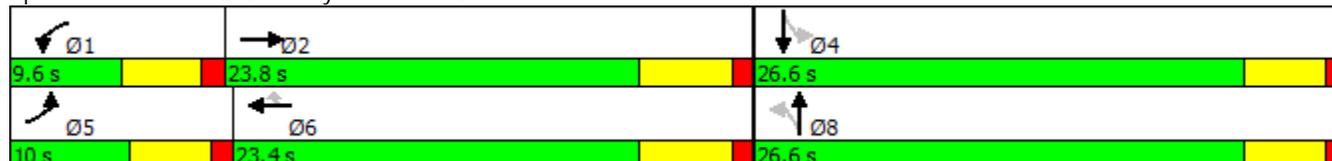
Cycle Length: 60

Actuated Cycle Length: 47

Natural Cycle: 60

Control Type: Actuated-Uncoordinated

Splits and Phases: 2: Driveway/Canal St. & Barton Rd.



HCM 2010 Signalized Intersection Summary
 2: Driveway/Canal St. & Barton Rd.

Roquet Ranch SP (JN 09434)

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	59	506	2	1	615	57	0	1	0	108	0	135
Future Volume (veh/h)	59	506	2	1	615	57	0	1	0	108	0	135
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1667	1765	1800	1667	1765	1765	1700	1765	1800	1667	1765	1800
Adj Flow Rate, veh/h	69	588	2	1	715	66	0	1	0	126	0	157
Adj No. of Lanes	1	2	0	1	2	1	0	1	0	1	1	0
Peak Hour Factor	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	102	1595	5	4	1350	604	0	379	0	430	0	322
Arrive On Green	0.06	0.47	0.47	0.00	0.40	0.40	0.00	0.21	0.00	0.21	0.00	0.21
Sat Flow, veh/h	1587	3427	12	1587	3353	1500	0	1765	0	1262	0	1500
Grp Volume(v), veh/h	69	288	302	1	715	66	0	1	0	126	0	157
Grp Sat Flow(s),veh/h/ln	1587	1676	1763	1587	1676	1500	0	1765	0	1262	0	1500
Q Serve(g_s), s	1.9	5.0	5.0	0.0	7.3	1.2	0.0	0.0	0.0	3.9	0.0	4.1
Cycle Q Clear(g_c), s	1.9	5.0	5.0	0.0	7.3	1.2	0.0	0.0	0.0	4.0	0.0	4.1
Prop In Lane	1.00		0.01	1.00		1.00	0.00		0.00	1.00		1.00
Lane Grp Cap(c), veh/h	102	780	820	4	1350	604	0	379	0	430	0	322
V/C Ratio(X)	0.68	0.37	0.37	0.28	0.53	0.11	0.00	0.00	0.00	0.29	0.00	0.49
Avail Cap(c_a), veh/h	190	780	820	176	1350	604	0	859	0	773	0	730
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	20.7	7.8	7.8	22.5	10.3	8.4	0.0	13.9	0.0	15.5	0.0	15.6
Incr Delay (d2), s/veh	2.9	1.3	1.3	15.6	1.5	0.4	0.0	0.0	0.0	0.4	0.0	1.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.9	2.6	2.7	0.0	3.7	0.6	0.0	0.0	0.0	1.4	0.0	1.8
LnGrp Delay(d),s/veh	23.6	9.1	9.1	38.2	11.8	8.8	0.0	13.9	0.0	15.9	0.0	16.7
LnGrp LOS	C	A	A	D	B	A		B		B		B
Approach Vol, veh/h		659			782			1				283
Approach Delay, s/veh		10.6			11.5			13.9				16.3
Approach LOS		B			B			B				B
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	4.7	26.2		14.3	7.5	23.4		14.3				
Change Period (Y+Rc), s	4.6	5.2		4.6	4.6	5.2		4.6				
Max Green Setting (Gmax), s	5.0	18.6		22.0	5.4	18.2		22.0				
Max Q Clear Time (g_c+I1), s	2.0	7.0		6.1	3.9	9.3		2.0				
Green Ext Time (p_c), s	0.0	6.1		1.3	0.0	5.1		1.4				
Intersection Summary												
HCM 2010 Ctrl Delay				12.0								
HCM 2010 LOS				B								

Intersection									
Intersection Delay, s/veh	21.2								
Intersection LOS	C								
Approach	EB		WB		NB		SB		
Entry Lanes	2		2		1		1		
Conflicting Circle Lanes	2		2		2		2		
Adj Approach Flow, veh/h	478		832		8		384		
Demand Flow Rate, veh/h	549		882		8		421		
Vehicles Circulating, veh/h	778		3		765		876		
Vehicles Exiting, veh/h	403		770		562		9		
Follow-Up Headway, s	3.186		3.186		3.186		3.186		
Ped Vol Crossing Leg, #/h	0		0		0		2		
Ped Cap Adj	1.000		1.000		1.000		1.000		
Approach Delay, s/veh	34.2		17.8		5.6		12.9		
Approach LOS	D		C		A		B		
Lane	Left	Right	Left	Right	Left	Left	Bypass		
Designated Moves	L	TR	LT	R	LTR	LT	R		
Assumed Moves	L	TR	LT	R	LTR	LT	R		
RT Channelized								Yield	
Lane Util	0.005	0.995	0.993	0.007	1.000	1.000			
Critical Headway, s	4.293	4.113	4.293	4.113	4.113	4.113			
Entry Flow, veh/h	3	546	876	6	8	305		116	
Cap Entry Lane, veh/h	630	655	1127	1128	661	612		755	
Entry HV Adj Factor	1.000	0.870	0.943	1.000	1.000	0.878		1.000	
Flow Entry, veh/h	3	475	826	6	8	268		116	
Cap Entry, veh/h	630	571	1063	1128	661	537		755	
V/C Ratio	0.005	0.833	0.777	0.005	0.012	0.499		0.154	
Control Delay, s/veh	5.8	34.4	17.9	3.2	5.6	15.7		6.4	
LOS	A	D	C	A	A	C		A	
95th %tile Queue, veh	0	9	8	0	0	3		1	

Intersection

Int Delay, s/veh 0.4

Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations	↖ ↗	↗ ↗	↖ ↗		↖ ↗	
Traffic Vol, veh/h	33	725	666	13	9	15
Future Vol, veh/h	33	725	666	13	9	15
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	50	-	-	-	0	-
Veh in Median Storage, #	-	0	0	-	2	-
Grade, %	-	0	0	-	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	2	2	2	2	2	2
Mvmt Flow	36	788	724	14	10	16

Major/Minor	Major1	Major2	Minor2
Conflicting Flow All	738	0	1197
Stage 1	-	-	731
Stage 2	-	-	466
Critical Hdwy	4.14	-	6.84
Critical Hdwy Stg 1	-	-	5.84
Critical Hdwy Stg 2	-	-	5.84
Follow-up Hdwy	2.22	-	3.52
Pot Cap-1 Maneuver	864	-	179
Stage 1	-	-	437
Stage 2	-	-	598
Platoon blocked, %	-	-	-
Mov Cap-1 Maneuver	864	-	172
Mov Cap-2 Maneuver	-	-	362
Stage 1	-	-	437
Stage 2	-	-	573

Approach	EB	WB	SB
HCM Control Delay, s	0.4	0	12.7
HCM LOS			B

Minor Lane/Major Mvmt	EBL	EBT	WBT	WBR	SBLn1
Capacity (veh/h)	864	-	-	-	492
HCM Lane V/C Ratio	0.042	-	-	-	0.053
HCM Control Delay (s)	9.3	-	-	-	12.7
HCM Lane LOS	A	-	-	-	B
HCM 95th %tile Q(veh)	0.1	-	-	-	0.2

Timings
2: Driveway/Canal St. & Barton Rd.

Roquet Ranch SP (JN 09434)

10/24/2017

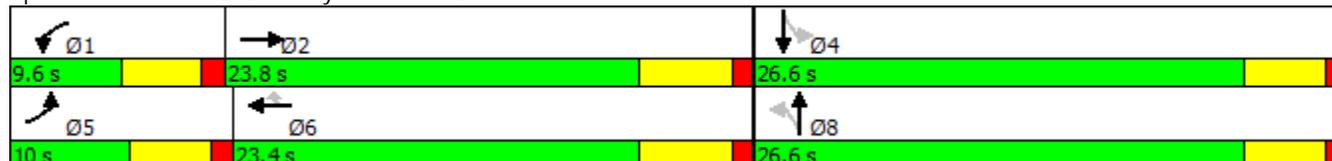


Lane Group	EBL	EBT	WBL	WBT	WBR	NBL	NBT	SBL	SBT
Lane Configurations	↙	↕↗	↙	↕↕	↗		↕↗	↙	↗
Traffic Volume (vph)	33	722	1	707	52	5	0	52	0
Future Volume (vph)	33	722	1	707	52	5	0	52	0
Turn Type	Prot	NA	Prot	NA	Perm	Perm	NA	Perm	NA
Protected Phases	5	2	1	6			8		4
Permitted Phases					6	8		4	
Detector Phase	5	2	1	6	6	8	8	4	4
Switch Phase									
Minimum Initial (s)	5.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.2	9.6	22.2	22.2	14.6	14.6	26.6	26.6
Total Split (s)	10.0	23.8	9.6	23.4	23.4	26.6	26.6	26.6	26.6
Total Split (%)	16.7%	39.7%	16.0%	39.0%	39.0%	44.3%	44.3%	44.3%	44.3%
Yellow Time (s)	3.6	4.2	3.6	4.2	4.2	3.6	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0		0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.6	5.2	5.2		4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lead	Lag	Lag				
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes				
Recall Mode	None	Max	None	Max	Max	None	None	None	None

Intersection Summary

Cycle Length: 60
 Actuated Cycle Length: 45.3
 Natural Cycle: 60
 Control Type: Actuated-Uncoordinated

Splits and Phases: 2: Driveway/Canal St. & Barton Rd.



HCM 2010 Signalized Intersection Summary
2: Driveway/Canal St. & Barton Rd.

Roquet Ranch SP (JN 09434)

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	33	722	1	1	707	52	5	0	1	52	0	72
Future Volume (veh/h)	33	722	1	1	707	52	5	0	1	52	0	72
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1667	1765	1800	1667	1765	1765	1700	1765	1800	1667	1765	1800
Adj Flow Rate, veh/h	34	737	1	1	721	53	5	0	1	53	0	73
Adj No. of Lanes	1	2	0	1	2	1	0	1	0	1	1	0
Peak Hour Factor	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	62	1614	2	4	1449	648	313	14	34	420	0	280
Arrive On Green	0.04	0.47	0.47	0.00	0.43	0.43	0.19	0.00	0.19	0.19	0.00	0.19
Sat Flow, veh/h	1587	3436	5	1587	3353	1500	834	73	181	1262	0	1500
Grp Volume(v), veh/h	34	360	378	1	721	53	6	0	0	53	0	73
Grp Sat Flow(s),veh/h/ln	1587	1676	1764	1587	1676	1500	1088	0	0	1262	0	1500
Q Serve(g_s), s	0.9	6.1	6.1	0.0	6.5	0.9	0.0	0.0	0.0	0.0	0.0	1.8
Cycle Q Clear(g_c), s	0.9	6.1	6.1	0.0	6.5	0.9	1.8	0.0	0.0	1.2	0.0	1.8
Prop In Lane	1.00		0.00	1.00		1.00	0.83		0.17	1.00		1.00
Lane Grp Cap(c), veh/h	62	788	829	4	1449	648	360	0	0	420	0	280
V/C Ratio(X)	0.55	0.46	0.46	0.27	0.50	0.08	0.02	0.00	0.00	0.13	0.00	0.26
Avail Cap(c_a), veh/h	204	788	829	188	1449	648	792	0	0	844	0	784
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	19.9	7.5	7.5	21.0	8.6	7.0	14.0	0.0	0.0	14.4	0.0	14.6
Incr Delay (d2), s/veh	2.8	1.9	1.8	13.3	1.2	0.2	0.0	0.0	0.0	0.1	0.0	0.5
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.4	3.2	3.4	0.0	3.3	0.4	0.1	0.0	0.0	0.5	0.0	0.8
LnGrp Delay(d),s/veh	22.7	9.4	9.3	34.3	9.9	7.3	14.0	0.0	0.0	14.5	0.0	15.1
LnGrp LOS	C	A	A	C	A	A	B			B		B
Approach Vol, veh/h		772			775			6			126	
Approach Delay, s/veh		10.0			9.7			14.0			14.9	
Approach LOS		A			A			B			B	
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	4.7	25.0		12.5	6.2	23.4		12.5				
Change Period (Y+Rc), s	4.6	5.2		4.6	4.6	5.2		4.6				
Max Green Setting (Gmax), s	5.0	18.6		22.0	5.4	18.2		22.0				
Max Q Clear Time (g_c+I1), s	2.0	8.1		3.8	2.9	8.5		3.8				
Green Ext Time (p_c), s	0.0	6.3		0.5	0.0	5.9		0.5				
Intersection Summary												
HCM 2010 Ctrl Delay				10.2								
HCM 2010 LOS				B								

Intersection									
Intersection Delay, s/veh	13.7								
Intersection LOS	B								
Approach	EB		WB		NB		SB		
Entry Lanes	2		2		1		1		
Conflicting Circle Lanes	2		2		2		2		
Adj Approach Flow, veh/h	501		673		54		458		
Demand Flow Rate, veh/h	528		712		54		467		
Vehicles Circulating, veh/h	595		6		801		707		
Vehicles Exiting, veh/h	428		849		322		11		
Follow-Up Headway, s	3.186		3.186		3.186		3.186		
Ped Vol Crossing Leg, #/h	0		0		0		4		
Ped Cap Adj	1.000		1.000		1.000		0.999		
Approach Delay, s/veh	19.7		11.9		6.5		10.5		
Approach LOS	C		B		A		B		
Lane	Left	Right	Left	Right	Left	Left	Bypass		
Designated Moves	L	TR	LT	R	LTR	LT	R		
Assumed Moves	L	TR	LT	R	LTR	LT	R		
RT Channelized								Yield	
Lane Util	0.008	0.992	0.990	0.010	1.000	1.000			
Critical Headway, s	4.293	4.113	4.293	4.113	4.113	4.113			
Entry Flow, veh/h	4	524	705	7	54	316		151	
Cap Entry Lane, veh/h	723	745	1125	1125	645	689		737	
Entry HV Adj Factor	1.000	0.948	0.945	1.000	1.000	0.972		1.000	
Flow Entry, veh/h	4	497	666	7	54	307		151	
Cap Entry, veh/h	723	706	1063	1125	645	669		736	
V/C Ratio	0.006	0.703	0.627	0.006	0.084	0.459		0.205	
Control Delay, s/veh	5.0	19.8	12.0	3.3	6.5	12.2		7.2	
LOS	A	C	B	A	A	B		A	
95th %tile Queue, veh	0	6	5	0	0	2		1	

OPENING YEAR CUMULATIVE (2020) WITHOUT PROJECT CONDITIONS

Timings

1: Barton Rd. & Vivenda Av.

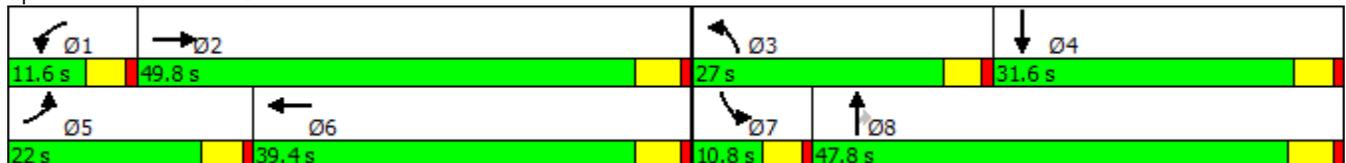


Lane Group	EBL	EBT	WBL	WBT	NBL	NBT	NBR	SBL	SBT
Lane Configurations	↙	↕	↙	↕	↙↕	↕	↙	↙	↕
Traffic Volume (vph)	153	537	42	747	392	13	52	18	34
Future Volume (vph)	153	537	42	747	392	13	52	18	34
Turn Type	Prot	NA	Prot	NA	Prot	NA	Perm	Prot	NA
Protected Phases	5	2	1	6	3	8		7	4
Permitted Phases							8		
Detector Phase	5	2	1	6	3	8	8	7	4
Switch Phase									
Minimum Initial (s)	5.0	10.0	5.0	10.0	5.0	10.0	10.0	5.0	10.0
Minimum Split (s)	9.6	22.2	9.6	22.2	9.5	32.2	32.2	9.5	31.6
Total Split (s)	22.0	49.8	11.6	39.4	27.0	47.8	47.8	10.8	31.6
Total Split (%)	18.3%	41.5%	9.7%	32.8%	22.5%	39.8%	39.8%	9.0%	26.3%
Yellow Time (s)	3.6	4.2	3.6	4.2	3.5	4.2	4.2	3.5	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.6	5.2	4.5	5.2	5.2	4.5	4.6
Lead/Lag	Lead	Lag	Lead	Lag	Lead	Lag	Lag	Lead	Lag
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Recall Mode	None	None	None	None	None	Min	Min	None	Min

Intersection Summary

Cycle Length: 120
 Actuated Cycle Length: 99.5
 Natural Cycle: 100
 Control Type: Actuated-Uncoordinated

Splits and Phases: 1: Barton Rd. & Vivenda Av.



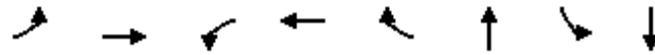
HCM 2010 Signalized Intersection Summary
 1: Barton Rd. & Vivenda Av.

Roquet Ranch SP (JN 09434)

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	153	537	210	42	747	39	392	13	52	18	34	141
Future Volume (veh/h)	153	537	210	42	747	39	392	13	52	18	34	141
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1667	1765	1800	1667	1835	1872	1569	1765	1765	1667	1765	1800
Adj Flow Rate, veh/h	184	647	193	51	900	47	472	29	24	22	41	110
Adj No. of Lanes	1	2	0	1	2	0	2	1	1	1	1	0
Peak Hour Factor	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	215	1108	330	63	1144	60	554	509	432	37	54	144
Arrive On Green	0.14	0.43	0.43	0.04	0.34	0.34	0.19	0.29	0.29	0.02	0.13	0.13
Sat Flow, veh/h	1587	2548	759	1587	3372	176	2988	1765	1500	1587	425	1139
Grp Volume(v), veh/h	184	426	414	51	465	482	472	29	24	22	0	151
Grp Sat Flow(s),veh/h/ln	1587	1676	1631	1587	1744	1804	1494	1765	1500	1587	0	1564
Q Serve(g_s), s	10.3	17.5	17.6	2.9	21.9	21.9	13.9	1.1	1.1	1.3	0.0	8.5
Cycle Q Clear(g_c), s	10.3	17.5	17.6	2.9	21.9	21.9	13.9	1.1	1.1	1.3	0.0	8.5
Prop In Lane	1.00		0.47	1.00		0.10	1.00		1.00	1.00		0.73
Lane Grp Cap(c), veh/h	215	729	709	63	592	612	554	509	432	37	0	197
V/C Ratio(X)	0.86	0.58	0.58	0.81	0.79	0.79	0.85	0.06	0.06	0.59	0.00	0.77
Avail Cap(c_a), veh/h	303	820	798	122	654	677	737	824	701	110	0	463
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	38.6	19.5	19.5	43.4	27.1	27.1	35.9	23.5	23.5	44.1	0.0	38.5
Incr Delay (d2), s/veh	11.8	0.8	0.9	8.7	5.8	5.6	7.3	0.0	0.1	14.1	0.0	6.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	5.3	8.2	8.0	1.4	11.4	11.8	6.3	0.5	0.4	0.7	0.0	4.0
LnGrp Delay(d),s/veh	50.4	20.4	20.4	52.2	32.9	32.8	43.2	23.5	23.5	58.2	0.0	44.6
LnGrp LOS	D	C	C	D	C	C	D	C	C	E		D
Approach Vol, veh/h		1024			998			525			173	
Approach Delay, s/veh		25.8			33.8			41.2			46.4	
Approach LOS		C			C			D			D	
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	8.2	44.8	21.4	16.7	16.9	36.1	6.6	31.5				
Change Period (Y+Rc), s	4.6	5.2	4.5	* 5.2	4.6	5.2	4.5	5.2				
Max Green Setting (Gmax), s	7.0	44.6	22.5	* 27	17.4	34.2	6.3	42.6				
Max Q Clear Time (g_c+I1), s	4.9	19.6	15.9	10.5	12.3	23.9	3.3	3.1				
Green Ext Time (p_c), s	0.0	12.6	1.0	1.0	0.1	7.0	0.0	1.3				
Intersection Summary												
HCM 2010 Ctrl Delay			33.0									
HCM 2010 LOS			C									
Notes												

Timings
2: Driveway/Canal St. & Barton Rd.



Lane Group	EBL	EBT	WBL	WBT	WBR	NBT	SBL	SBT
Lane Configurations	↙	↕	↙	↕	↗	↕	↙	↕
Traffic Volume (vph)	61	501	1	639	59	1	111	0
Future Volume (vph)	61	501	1	639	59	1	111	0
Turn Type	Prot	NA	Prot	NA	Perm	NA	Perm	NA
Protected Phases	5	2	1	6		8		4
Permitted Phases					6		4	
Detector Phase	5	2	1	6	6	8	4	4
Switch Phase								
Minimum Initial (s)	5.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.2	9.6	22.2	22.2	14.6	26.6	26.6
Total Split (s)	10.0	23.8	9.6	23.4	23.4	26.6	26.6	26.6
Total Split (%)	16.7%	39.7%	16.0%	39.0%	39.0%	44.3%	44.3%	44.3%
Yellow Time (s)	3.6	4.2	3.6	4.2	4.2	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.6	5.2	5.2	4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lead	Lag	Lag			
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes			
Recall Mode	None	Max	None	Max	Max	None	None	None

Intersection Summary

Cycle Length: 60
 Actuated Cycle Length: 47.1
 Natural Cycle: 60
 Control Type: Actuated-Uncoordinated

Splits and Phases: 2: Driveway/Canal St. & Barton Rd.



HCM 2010 Signalized Intersection Summary
 2: Driveway/Canal St. & Barton Rd.

Roquet Ranch SP (JN 09434)

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	61	501	2	1	639	59	0	1	0	111	0	139
Future Volume (veh/h)	61	501	2	1	639	59	0	1	0	111	0	139
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1667	1765	1800	1667	1765	1765	1700	1765	1800	1667	1765	1800
Adj Flow Rate, veh/h	71	583	2	1	743	69	0	1	0	129	0	162
Adj No. of Lanes	1	2	0	1	2	1	0	1	0	1	1	0
Peak Hour Factor	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	103	1596	5	4	1347	603	0	380	0	430	0	323
Arrive On Green	0.07	0.47	0.47	0.00	0.40	0.40	0.00	0.22	0.00	0.22	0.00	0.22
Sat Flow, veh/h	1587	3427	12	1587	3353	1500	0	1765	0	1262	0	1500
Grp Volume(v), veh/h	71	285	300	1	743	69	0	1	0	129	0	162
Grp Sat Flow(s),veh/h/ln	1587	1676	1763	1587	1676	1500	0	1765	0	1262	0	1500
Q Serve(g_s), s	2.0	5.0	5.0	0.0	7.7	1.3	0.0	0.0	0.0	4.1	0.0	4.3
Cycle Q Clear(g_c), s	2.0	5.0	5.0	0.0	7.7	1.3	0.0	0.0	0.0	4.1	0.0	4.3
Prop In Lane	1.00		0.01	1.00		1.00	0.00		0.00	1.00		1.00
Lane Grp Cap(c), veh/h	103	781	821	4	1347	603	0	380	0	430	0	323
V/C Ratio(X)	0.69	0.37	0.37	0.29	0.55	0.11	0.00	0.00	0.00	0.30	0.00	0.50
Avail Cap(c_a), veh/h	189	781	821	175	1347	603	0	857	0	771	0	728
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	20.7	7.8	7.8	22.6	10.4	8.5	0.0	14.0	0.0	15.6	0.0	15.6
Incr Delay (d2), s/veh	3.0	1.3	1.3	15.7	1.6	0.4	0.0	0.0	0.0	0.4	0.0	1.2
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.0	2.6	2.7	0.0	3.8	0.6	0.0	0.0	0.0	1.4	0.0	1.9
LnGrp Delay(d),s/veh	23.7	9.1	9.1	38.3	12.0	8.9	0.0	14.0	0.0	15.9	0.0	16.8
LnGrp LOS	C	A	A	D	B	A		B		B		B
Approach Vol, veh/h		656			813			1			291	
Approach Delay, s/veh		10.7			11.8			14.0			16.4	
Approach LOS		B			B			B			B	
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	4.7	26.3		14.3	7.6	23.4		14.3				
Change Period (Y+Rc), s	4.6	5.2		4.6	4.6	5.2		4.6				
Max Green Setting (Gmax), s	5.0	18.6		22.0	5.4	18.2		22.0				
Max Q Clear Time (g_c+I1), s	2.0	7.0		6.3	4.0	9.7		2.0				
Green Ext Time (p_c), s	0.0	6.3		1.3	0.0	5.0		1.4				
Intersection Summary												
HCM 2010 Ctrl Delay				12.2								
HCM 2010 LOS				B								

Timings

1: Barton Rd. & Vivenda Av.

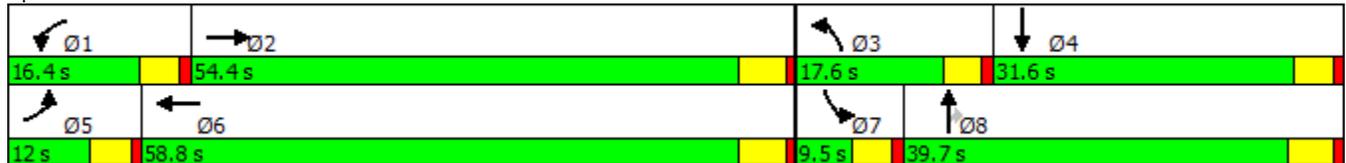


Lane Group	EBL	EBT	WBL	WBT	NBL	NBT	NBR	SBL	SBT
Lane Configurations	↙	↕	↙	↕	↙	↕	↗	↙	↕
Traffic Volume (vph)	34	914	131	890	270	32	129	9	7
Future Volume (vph)	34	914	131	890	270	32	129	9	7
Turn Type	Prot	NA	Prot	NA	Prot	NA	Perm	Prot	NA
Protected Phases	5	2	1	6	3	8		7	4
Permitted Phases							8		
Detector Phase	5	2	1	6	3	8	8	7	4
Switch Phase									
Minimum Initial (s)	5.0	10.0	5.0	10.0	5.0	10.0	10.0	5.0	10.0
Minimum Split (s)	9.6	22.2	9.6	22.2	9.5	32.2	32.2	9.5	31.6
Total Split (s)	12.0	54.4	16.4	58.8	17.6	39.7	39.7	9.5	31.6
Total Split (%)	10.0%	45.3%	13.7%	49.0%	14.7%	33.1%	33.1%	7.9%	26.3%
Yellow Time (s)	3.6	4.2	3.6	4.2	3.5	4.2	4.2	3.5	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.6	5.2	4.5	5.2	5.2	4.5	4.6
Lead/Lag	Lead	Lag	Lead	Lag	Lead	Lag	Lag	Lead	Lag
Lead-Lag Optimize?	Yes	Yes	Yes						
Recall Mode	None	None	None	None	None	Min	Min	None	Min

Intersection Summary

Cycle Length: 120
 Actuated Cycle Length: 106.3
 Natural Cycle: 120
 Control Type: Actuated-Uncoordinated

Splits and Phases: 1: Barton Rd. & Vivenda Av.



HCM 2010 Signalized Intersection Summary
 1: Barton Rd. & Vivenda Av.

Roquet Ranch SP (JN 09434)

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	34	914	337	131	890	19	270	32	129	9	7	27
Future Volume (veh/h)	34	914	337	131	890	19	270	32	129	9	7	27
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1667	1765	1800	1667	1835	1872	1569	1765	1765	1667	1765	1800
Adj Flow Rate, veh/h	37	993	203	142	967	21	293	73	60	10	8	29
Adj No. of Lanes	1	2	0	1	2	0	2	1	1	1	1	0
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	52	1280	261	169	1867	41	356	376	320	19	36	129
Arrive On Green	0.03	0.46	0.46	0.11	0.53	0.53	0.12	0.21	0.21	0.01	0.11	0.11
Sat Flow, veh/h	1587	2775	566	1587	3490	76	2988	1765	1500	1587	335	1215
Grp Volume(v), veh/h	37	599	597	142	483	505	293	73	60	10	0	37
Grp Sat Flow(s),veh/h/ln	1587	1676	1665	1587	1744	1822	1494	1765	1500	1587	0	1550
Q Serve(g_s), s	2.2	28.2	28.4	8.3	16.8	16.8	9.0	3.2	3.1	0.6	0.0	2.1
Cycle Q Clear(g_c), s	2.2	28.2	28.4	8.3	16.8	16.8	9.0	3.2	3.1	0.6	0.0	2.1
Prop In Lane	1.00		0.34	1.00		0.04	1.00		1.00	1.00		0.78
Lane Grp Cap(c), veh/h	52	773	768	169	933	975	356	376	320	19	0	164
V/C Ratio(X)	0.71	0.77	0.78	0.84	0.52	0.52	0.82	0.19	0.19	0.52	0.00	0.22
Avail Cap(c_a), veh/h	125	875	869	199	991	1036	415	646	549	84	0	444
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	45.1	21.3	21.3	41.3	14.1	14.1	40.5	30.4	30.4	46.3	0.0	38.6
Incr Delay (d2), s/veh	6.4	3.9	4.0	20.5	0.4	0.4	11.1	0.2	0.3	19.6	0.0	0.7
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.0	13.8	13.8	4.6	8.2	8.5	4.3	1.6	1.3	0.4	0.0	0.9
LnGrp Delay(d),s/veh	51.5	25.2	25.3	61.8	14.5	14.5	51.6	30.7	30.7	65.9	0.0	39.3
LnGrp LOS	D	C	C	E	B	B	D	C	C	E		D
Approach Vol, veh/h		1233			1130			426				47
Approach Delay, s/veh		26.1			20.5			45.1				44.9
Approach LOS		C			C			D				D
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	14.6	48.7	15.7	15.2	7.7	55.6	5.7	25.3				
Change Period (Y+Rc), s	4.6	5.2	4.5	* 5.2	4.6	5.2	4.5	5.2				
Max Green Setting (Gmax), s	11.8	49.2	13.1	* 27	7.4	53.6	5.0	34.5				
Max Q Clear Time (g_c+I1), s	10.3	30.4	11.0	4.1	4.2	18.8	2.6	5.2				
Green Ext Time (p_c), s	0.0	13.1	0.2	0.7	0.0	19.5	0.0	0.8				
Intersection Summary												
HCM 2010 Ctrl Delay			27.0									
HCM 2010 LOS			C									
Notes												

Timings

2: Driveway/Canal St. & Barton Rd.



Lane Group	EBL	EBT	WBL	WBT	WBR	NBL	NBT	SBL	SBT
Lane Configurations									
Traffic Volume (vph)	34	889	1	852	54	5	0	54	0
Future Volume (vph)	34	889	1	852	54	5	0	54	0
Turn Type	Prot	NA	Prot	NA	Perm	Perm	NA	Perm	NA
Protected Phases	5	2	1	6			8		4
Permitted Phases					6	8		4	
Detector Phase	5	2	1	6	6	8	8	4	4
Switch Phase									
Minimum Initial (s)	5.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.2	9.6	22.2	22.2	14.6	14.6	26.6	26.6
Total Split (s)	9.6	23.8	9.6	23.8	23.8	26.6	26.6	26.6	26.6
Total Split (%)	16.0%	39.7%	16.0%	39.7%	39.7%	44.3%	44.3%	44.3%	44.3%
Yellow Time (s)	3.6	4.2	3.6	4.2	4.2	3.6	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0		0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.6	5.2	5.2		4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lead	Lag	Lag				
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes				
Recall Mode	None	Max	None	Max	Max	None	None	None	None

Intersection Summary

Cycle Length: 60

Actuated Cycle Length: 48.2

Natural Cycle: 60

Control Type: Actuated-Uncoordinated

Splits and Phases: 2: Driveway/Canal St. & Barton Rd.



HCM 2010 Signalized Intersection Summary
2: Driveway/Canal St. & Barton Rd.

Roquet Ranch SP (JN 09434)

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		 			 			 				
Traffic Volume (veh/h)	34	889	1	1	852	54	5	0	1	54	0	74
Future Volume (veh/h)	34	889	1	1	852	54	5	0	1	54	0	74
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1667	1765	1800	1667	1765	1765	1700	1765	1800	1667	1765	1800
Adj Flow Rate, veh/h	35	907	1	1	869	55	5	0	1	55	0	76
Adj No. of Lanes	1	2	0	1	2	1	0	1	0	1	1	0
Peak Hour Factor	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	63	1628	2	4	1459	653	309	13	34	420	0	282
Arrive On Green	0.04	0.47	0.47	0.00	0.44	0.44	0.19	0.00	0.19	0.19	0.00	0.19
Sat Flow, veh/h	1587	3437	4	1587	3353	1500	824	71	179	1262	0	1500
Grp Volume(v), veh/h	35	442	466	1	869	55	6	0	0	55	0	76
Grp Sat Flow(s),veh/h/ln	1587	1676	1764	1587	1676	1500	1074	0	0	1262	0	1500
Q Serve(g_s), s	0.9	8.1	8.1	0.0	8.4	0.9	0.0	0.0	0.0	0.0	0.0	1.9
Cycle Q Clear(g_c), s	0.9	8.1	8.1	0.0	8.4	0.9	1.9	0.0	0.0	1.2	0.0	1.9
Prop In Lane	1.00		0.00	1.00		1.00	0.83		0.17	1.00		1.00
Lane Grp Cap(c), veh/h	63	794	836	4	1459	653	356	0	0	420	0	282
V/C Ratio(X)	0.55	0.56	0.56	0.27	0.60	0.08	0.02	0.00	0.00	0.13	0.00	0.27
Avail Cap(c_a), veh/h	186	794	836	186	1459	653	776	0	0	832	0	772
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	20.1	8.0	8.0	21.3	9.2	7.1	14.2	0.0	0.0	14.6	0.0	14.8
Incr Delay (d2), s/veh	2.8	2.8	2.7	13.7	1.8	0.3	0.0	0.0	0.0	0.1	0.0	0.5
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.4	4.3	4.5	0.0	4.2	0.4	0.1	0.0	0.0	0.6	0.0	0.8
LnGrp Delay(d),s/veh	23.0	10.9	10.7	35.0	11.0	7.3	14.2	0.0	0.0	14.7	0.0	15.3
LnGrp LOS	C	B	B	D	B	A	B			B		B
Approach Vol, veh/h		943			925			6				131
Approach Delay, s/veh		11.2			10.8			14.2				15.1
Approach LOS		B			B			B				B
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	4.7	25.4		12.6	6.3	23.8		12.6				
Change Period (Y+Rc), s	4.6	5.2		4.6	4.6	5.2		4.6				
Max Green Setting (Gmax), s	5.0	18.6		22.0	5.0	18.6		22.0				
Max Q Clear Time (g_c+I1), s	2.0	10.1		3.9	2.9	10.4		3.9				
Green Ext Time (p_c), s	0.0	6.2		0.6	0.0	6.0		0.6				
Intersection Summary												
HCM 2010 Ctrl Delay				11.3								
HCM 2010 LOS				B								

OPENING YEAR CUMULATIVE (2020) WITH PROJECT CONDITIONS

Timings
1: Barton Rd. & Vivenda Av.

Roquet Ranch SP (JN 09434)

10/24/2017

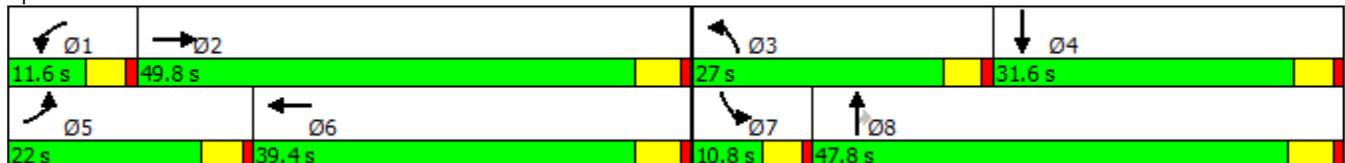


Lane Group	EBL	EBT	WBL	WBT	NBL	NBT	NBR	SBL	SBT
Lane Configurations	↙	↕	↙	↕	↙↕	↕	↗	↙	↕
Traffic Volume (vph)	153	604	42	776	392	13	52	18	34
Future Volume (vph)	153	604	42	776	392	13	52	18	34
Turn Type	Prot	NA	Prot	NA	Prot	NA	Perm	Prot	NA
Protected Phases	5	2	1	6	3	8		7	4
Permitted Phases							8		
Detector Phase	5	2	1	6	3	8	8	7	4
Switch Phase									
Minimum Initial (s)	5.0	10.0	5.0	10.0	5.0	10.0	10.0	5.0	10.0
Minimum Split (s)	9.6	22.2	9.6	22.2	9.5	32.2	32.2	9.5	31.6
Total Split (s)	22.0	49.8	11.6	39.4	27.0	47.8	47.8	10.8	31.6
Total Split (%)	18.3%	41.5%	9.7%	32.8%	22.5%	39.8%	39.8%	9.0%	26.3%
Yellow Time (s)	3.6	4.2	3.6	4.2	3.5	4.2	4.2	3.5	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.6	5.2	4.5	5.2	5.2	4.5	4.6
Lead/Lag	Lead	Lag	Lead	Lag	Lead	Lag	Lag	Lead	Lag
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Recall Mode	None	None	None	None	None	Min	Min	None	Min

Intersection Summary

Cycle Length: 120
 Actuated Cycle Length: 100.7
 Natural Cycle: 100
 Control Type: Actuated-Uncoordinated

Splits and Phases: 1: Barton Rd. & Vivenda Av.



HCM 2010 Signalized Intersection Summary
 1: Barton Rd. & Vivenda Av.

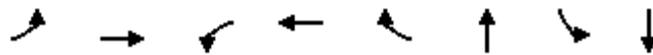
Roquet Ranch SP (JN 09434)

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	153	604	210	42	776	39	392	13	52	18	34	141
Future Volume (veh/h)	153	604	210	42	776	39	392	13	52	18	34	141
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1667	1765	1800	1667	1835	1872	1569	1765	1765	1667	1765	1800
Adj Flow Rate, veh/h	184	728	193	51	935	47	472	29	24	22	41	110
Adj No. of Lanes	1	2	0	1	2	0	2	1	1	1	1	0
Peak Hour Factor	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83	0.83
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	214	1152	305	63	1162	58	553	507	431	37	53	143
Arrive On Green	0.13	0.44	0.44	0.04	0.34	0.34	0.18	0.29	0.29	0.02	0.13	0.13
Sat Flow, veh/h	1587	2623	695	1587	3379	170	2988	1765	1500	1587	425	1139
Grp Volume(v), veh/h	184	465	456	51	482	500	472	29	24	22	0	151
Grp Sat Flow(s),veh/h/ln	1587	1676	1642	1587	1744	1805	1494	1765	1500	1587	0	1564
Q Serve(g_s), s	10.5	19.9	19.9	3.0	23.2	23.2	14.2	1.1	1.1	1.3	0.0	8.7
Cycle Q Clear(g_c), s	10.5	19.9	19.9	3.0	23.2	23.2	14.2	1.1	1.1	1.3	0.0	8.7
Prop In Lane	1.00		0.42	1.00		0.09	1.00		1.00	1.00		0.73
Lane Grp Cap(c), veh/h	214	736	721	63	599	621	553	507	431	37	0	196
V/C Ratio(X)	0.86	0.63	0.63	0.81	0.80	0.80	0.85	0.06	0.06	0.59	0.00	0.77
Avail Cap(c_a), veh/h	298	808	791	120	644	667	726	812	690	108	0	456
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	39.2	20.1	20.1	44.1	27.5	27.5	36.5	23.9	23.9	44.8	0.0	39.2
Incr Delay (d2), s/veh	12.6	1.4	1.4	9.1	7.0	6.7	7.7	0.0	0.1	14.2	0.0	6.2
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	5.3	9.5	9.3	1.4	12.3	12.7	6.4	0.5	0.5	0.7	0.0	4.1
LnGrp Delay(d),s/veh	51.8	21.5	21.6	53.2	34.5	34.3	44.2	24.0	23.9	59.0	0.0	45.4
LnGrp LOS	D	C	C	D	C	C	D	C	C	E		D
Approach Vol, veh/h		1105			1033			525			173	
Approach Delay, s/veh		26.6			35.3			42.2			47.1	
Approach LOS		C			D			D			D	
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	8.3	45.9	21.6	16.8	17.1	37.0	6.7	31.8				
Change Period (Y+Rc), s	4.6	5.2	4.5	* 5.2	4.6	5.2	4.5	5.2				
Max Green Setting (Gmax), s	7.0	44.6	22.5	* 27	17.4	34.2	6.3	42.6				
Max Q Clear Time (g_c+I1), s	5.0	21.9	16.2	10.7	12.5	25.2	3.3	3.1				
Green Ext Time (p_c), s	0.0	12.8	1.0	1.0	0.1	6.6	0.0	1.3				
Intersection Summary												
HCM 2010 Ctrl Delay			33.9									
HCM 2010 LOS			C									
Notes												

Timings

2: Driveway/Canal St. & Barton Rd.



Lane Group	EBL	EBT	WBL	WBT	WBR	NBT	SBL	SBT
Lane Configurations								
Traffic Volume (vph)	61	568	1	668	59	1	111	0
Future Volume (vph)	61	568	1	668	59	1	111	0
Turn Type	Prot	NA	Prot	NA	Perm	NA	Perm	NA
Protected Phases	5	2	1	6		8		4
Permitted Phases					6		4	
Detector Phase	5	2	1	6	6	8	4	4
Switch Phase								
Minimum Initial (s)	5.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.2	9.6	22.2	22.2	14.6	26.6	26.6
Total Split (s)	10.0	23.8	9.6	23.4	23.4	26.6	26.6	26.6
Total Split (%)	16.7%	39.7%	16.0%	39.0%	39.0%	44.3%	44.3%	44.3%
Yellow Time (s)	3.6	4.2	3.6	4.2	4.2	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.6	5.2	5.2	4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lead	Lag	Lag			
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes			
Recall Mode	None	Max	None	Max	Max	None	None	None

Intersection Summary

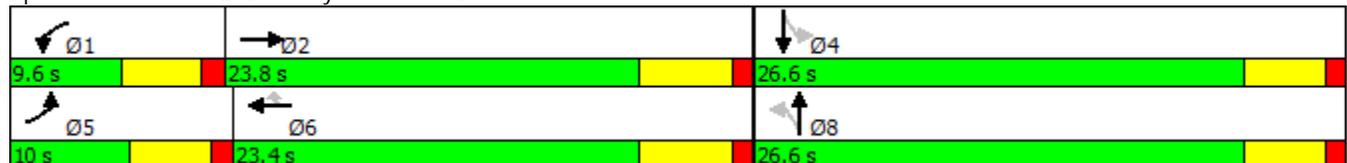
Cycle Length: 60

Actuated Cycle Length: 47.1

Natural Cycle: 60

Control Type: Actuated-Uncoordinated

Splits and Phases: 2: Driveway/Canal St. & Barton Rd.



HCM 2010 Signalized Intersection Summary
2: Driveway/Canal St. & Barton Rd.

Roquet Ranch SP (JN 09434)

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	61	568	2	1	668	59	0	1	0	111	0	139
Future Volume (veh/h)	61	568	2	1	668	59	0	1	0	111	0	139
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1667	1765	1800	1667	1765	1765	1700	1765	1800	1667	1765	1800
Adj Flow Rate, veh/h	71	660	2	1	777	69	0	1	0	129	0	162
Adj No. of Lanes	1	2	0	1	2	1	0	1	0	1	1	0
Peak Hour Factor	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86	0.86
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	103	1596	5	4	1347	603	0	380	0	430	0	323
Arrive On Green	0.07	0.47	0.47	0.00	0.40	0.40	0.00	0.22	0.00	0.22	0.00	0.22
Sat Flow, veh/h	1587	3429	10	1587	3353	1500	0	1765	0	1262	0	1500
Grp Volume(v), veh/h	71	323	339	1	777	69	0	1	0	129	0	162
Grp Sat Flow(s),veh/h/ln	1587	1676	1763	1587	1676	1500	0	1765	0	1262	0	1500
Q Serve(g_s), s	2.0	5.8	5.8	0.0	8.2	1.3	0.0	0.0	0.0	4.1	0.0	4.3
Cycle Q Clear(g_c), s	2.0	5.8	5.8	0.0	8.2	1.3	0.0	0.0	0.0	4.1	0.0	4.3
Prop In Lane	1.00		0.01	1.00		1.00	0.00		0.00	1.00		1.00
Lane Grp Cap(c), veh/h	103	781	821	4	1347	603	0	380	0	430	0	323
V/C Ratio(X)	0.69	0.41	0.41	0.29	0.58	0.11	0.00	0.00	0.00	0.30	0.00	0.50
Avail Cap(c_a), veh/h	189	781	821	175	1347	603	0	857	0	771	0	728
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	20.7	8.0	8.0	22.6	10.6	8.5	0.0	14.0	0.0	15.6	0.0	15.6
Incr Delay (d2), s/veh	3.0	1.6	1.5	15.7	1.8	0.4	0.0	0.0	0.0	0.4	0.0	1.2
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.0	2.9	3.1	0.0	4.1	0.6	0.0	0.0	0.0	1.4	0.0	1.9
LnGrp Delay(d),s/veh	23.7	9.6	9.5	38.3	12.4	8.9	0.0	14.0	0.0	15.9	0.0	16.8
LnGrp LOS	C	A	A	D	B	A		B		B		B
Approach Vol, veh/h		733			847			1			291	
Approach Delay, s/veh		11.0			12.1			14.0			16.4	
Approach LOS		B			B			B			B	
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	4.7	26.3		14.3	7.6	23.4		14.3				
Change Period (Y+Rc), s	4.6	5.2		4.6	4.6	5.2		4.6				
Max Green Setting (Gmax), s	5.0	18.6		22.0	5.4	18.2		22.0				
Max Q Clear Time (g_c+I1), s	2.0	7.8		6.3	4.0	10.2		2.0				
Green Ext Time (p_c), s	0.0	6.4		1.3	0.0	5.1		1.4				
Intersection Summary												
HCM 2010 Ctrl Delay				12.3								
HCM 2010 LOS				B								

Timings
1: Barton Rd. & Vivenda Av.

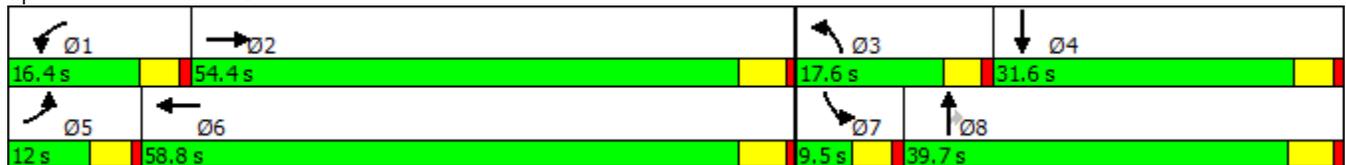


Lane Group	EBL	EBT	WBL	WBT	NBL	NBT	NBR	SBL	SBT
Lane Configurations	↙	↕	↙	↕	↙	↕	↗	↙	↕
Traffic Volume (vph)	34	959	131	965	270	32	129	9	7
Future Volume (vph)	34	959	131	965	270	32	129	9	7
Turn Type	Prot	NA	Prot	NA	Prot	NA	Perm	Prot	NA
Protected Phases	5	2	1	6	3	8		7	4
Permitted Phases							8		
Detector Phase	5	2	1	6	3	8	8	7	4
Switch Phase									
Minimum Initial (s)	5.0	10.0	5.0	10.0	5.0	10.0	10.0	5.0	10.0
Minimum Split (s)	9.6	22.2	9.6	22.2	9.5	32.2	32.2	9.5	31.6
Total Split (s)	12.0	54.4	16.4	58.8	17.6	39.7	39.7	9.5	31.6
Total Split (%)	10.0%	45.3%	13.7%	49.0%	14.7%	33.1%	33.1%	7.9%	26.3%
Yellow Time (s)	3.6	4.2	3.6	4.2	3.5	4.2	4.2	3.5	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.6	5.2	4.5	5.2	5.2	4.5	4.6
Lead/Lag	Lead	Lag	Lead	Lag	Lead	Lag	Lag	Lead	Lag
Lead-Lag Optimize?	Yes	Yes	Yes						
Recall Mode	None	None	None	None	None	Min	Min	None	Min

Intersection Summary

Cycle Length: 120
 Actuated Cycle Length: 106.3
 Natural Cycle: 120
 Control Type: Actuated-Uncoordinated

Splits and Phases: 1: Barton Rd. & Vivenda Av.



HCM 2010 Signalized Intersection Summary
 1: Barton Rd. & Vivenda Av.

Roquet Ranch SP (JN 09434)

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		 			 		 					
Traffic Volume (veh/h)	34	959	337	131	965	19	270	32	129	9	7	27
Future Volume (veh/h)	34	959	337	131	965	19	270	32	129	9	7	27
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1667	1765	1800	1667	1835	1872	1569	1765	1765	1667	1765	1800
Adj Flow Rate, veh/h	37	1042	203	142	1049	21	293	73	60	10	8	29
Adj No. of Lanes	1	2	0	1	2	0	2	1	1	1	1	0
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	52	1311	255	169	1895	38	354	371	316	19	35	126
Arrive On Green	0.03	0.47	0.47	0.11	0.54	0.54	0.12	0.21	0.21	0.01	0.10	0.10
Sat Flow, veh/h	1587	2801	544	1587	3496	70	2988	1765	1500	1587	335	1215
Grp Volume(v), veh/h	37	623	622	142	523	547	293	73	60	10	0	37
Grp Sat Flow(s),veh/h/ln	1587	1676	1669	1587	1744	1823	1494	1765	1500	1587	0	1550
Q Serve(g_s), s	2.2	30.2	30.4	8.4	18.9	18.9	9.2	3.3	3.2	0.6	0.0	2.1
Cycle Q Clear(g_c), s	2.2	30.2	30.4	8.4	18.9	18.9	9.2	3.3	3.2	0.6	0.0	2.1
Prop In Lane	1.00		0.33	1.00		0.04	1.00		1.00	1.00		0.78
Lane Grp Cap(c), veh/h	52	785	781	169	945	988	354	371	316	19	0	161
V/C Ratio(X)	0.71	0.79	0.80	0.84	0.55	0.55	0.83	0.20	0.19	0.52	0.00	0.23
Avail Cap(c_a), veh/h	122	858	854	195	972	1016	407	633	538	83	0	435
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	46.1	21.6	21.7	42.2	14.4	14.4	41.4	31.3	31.2	47.2	0.0	39.5
Incr Delay (d2), s/veh	6.6	4.8	4.9	21.7	0.6	0.6	11.8	0.3	0.3	19.7	0.0	0.7
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.1	14.9	15.1	4.7	9.2	9.6	4.4	1.6	1.3	0.4	0.0	0.9
LnGrp Delay(d),s/veh	52.7	26.4	26.6	63.9	15.1	15.0	53.2	31.5	31.5	66.9	0.0	40.3
LnGrp LOS	D	C	C	E	B	B	D	C	C	E		D
Approach Vol, veh/h		1282			1212			426			47	
Approach Delay, s/veh		27.3			20.8			46.4			45.9	
Approach LOS		C			C			D			D	
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	14.8	50.2	15.9	15.2	7.7	57.3	5.7	25.4				
Change Period (Y+Rc), s	4.6	5.2	4.5	* 5.2	4.6	5.2	4.5	5.2				
Max Green Setting (Gmax), s	11.8	49.2	13.1	* 27	7.4	53.6	5.0	34.5				
Max Q Clear Time (g_c+I1), s	10.4	32.4	11.2	4.1	4.2	20.9	2.6	5.3				
Green Ext Time (p_c), s	0.0	12.6	0.2	0.7	0.0	20.2	0.0	0.8				
Intersection Summary												
HCM 2010 Ctrl Delay			27.7									
HCM 2010 LOS			C									
Notes												

Timings

2: Driveway/Canal St. & Barton Rd.



Lane Group	EBL	EBT	WBL	WBT	WBR	NBL	NBT	SBL	SBT
Lane Configurations									
Traffic Volume (vph)	34	934	1	927	54	5	0	54	0
Future Volume (vph)	34	934	1	927	54	5	0	54	0
Turn Type	Prot	NA	Prot	NA	Perm	Perm	NA	Perm	NA
Protected Phases	5	2	1	6			8		4
Permitted Phases					6	8		4	
Detector Phase	5	2	1	6	6	8	8	4	4
Switch Phase									
Minimum Initial (s)	5.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.2	9.6	22.2	22.2	14.6	14.6	26.6	26.6
Total Split (s)	9.6	23.8	9.6	23.8	23.8	26.6	26.6	26.6	26.6
Total Split (%)	16.0%	39.7%	16.0%	39.7%	39.7%	44.3%	44.3%	44.3%	44.3%
Yellow Time (s)	3.6	4.2	3.6	4.2	4.2	3.6	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0		0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.6	5.2	5.2		4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lead	Lag	Lag				
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes				
Recall Mode	None	Max	None	Max	Max	None	None	None	None

Intersection Summary

Cycle Length: 60

Actuated Cycle Length: 48.2

Natural Cycle: 60

Control Type: Actuated-Uncoordinated

Splits and Phases: 2: Driveway/Canal St. & Barton Rd.



HCM 2010 Signalized Intersection Summary
2: Driveway/Canal St. & Barton Rd.

Roquet Ranch SP (JN 09434)

10/24/2017

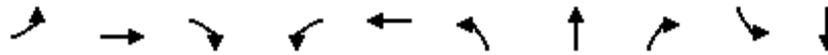
												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	34	934	1	1	927	54	5	0	1	54	0	74
Future Volume (veh/h)	34	934	1	1	927	54	5	0	1	54	0	74
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1667	1765	1800	1667	1765	1765	1700	1765	1800	1667	1765	1800
Adj Flow Rate, veh/h	35	953	1	1	946	55	5	0	1	55	0	76
Adj No. of Lanes	1	2	0	1	2	1	0	1	0	1	1	0
Peak Hour Factor	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	63	1628	2	4	1459	653	309	13	34	420	0	282
Arrive On Green	0.04	0.47	0.47	0.00	0.44	0.44	0.19	0.00	0.19	0.19	0.00	0.19
Sat Flow, veh/h	1587	3437	4	1587	3353	1500	824	71	179	1262	0	1500
Grp Volume(v), veh/h	35	465	489	1	946	55	6	0	0	55	0	76
Grp Sat Flow(s),veh/h/ln	1587	1676	1764	1587	1676	1500	1074	0	0	1262	0	1500
Q Serve(g_s), s	0.9	8.6	8.6	0.0	9.5	0.9	0.0	0.0	0.0	0.0	0.0	1.9
Cycle Q Clear(g_c), s	0.9	8.6	8.6	0.0	9.5	0.9	1.9	0.0	0.0	1.2	0.0	1.9
Prop In Lane	1.00		0.00	1.00		1.00	0.83		0.17	1.00		1.00
Lane Grp Cap(c), veh/h	63	794	836	4	1459	653	356	0	0	420	0	282
V/C Ratio(X)	0.55	0.59	0.59	0.27	0.65	0.08	0.02	0.00	0.00	0.13	0.00	0.27
Avail Cap(c_a), veh/h	186	794	836	186	1459	653	776	0	0	832	0	772
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	20.1	8.2	8.2	21.3	9.5	7.1	14.2	0.0	0.0	14.6	0.0	14.8
Incr Delay (d2), s/veh	2.8	3.1	3.0	13.7	2.2	0.3	0.0	0.0	0.0	0.1	0.0	0.5
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.4	4.6	4.8	0.0	4.8	0.4	0.1	0.0	0.0	0.6	0.0	0.8
LnGrp Delay(d),s/veh	23.0	11.3	11.2	35.0	11.7	7.3	14.2	0.0	0.0	14.7	0.0	15.3
LnGrp LOS	C	B	B	D	B	A	B			B		B
Approach Vol, veh/h		989			1002			6				131
Approach Delay, s/veh		11.7			11.5			14.2				15.1
Approach LOS		B			B			B				B
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	4.7	25.4		12.6	6.3	23.8		12.6				
Change Period (Y+Rc), s	4.6	5.2		4.6	4.6	5.2		4.6				
Max Green Setting (Gmax), s	5.0	18.6		22.0	5.0	18.6		22.0				
Max Q Clear Time (g_c+I1), s	2.0	10.6		3.9	2.9	11.5		3.9				
Green Ext Time (p_c), s	0.0	6.1		0.6	0.0	5.6		0.6				
Intersection Summary												
HCM 2010 Ctrl Delay				11.8								
HCM 2010 LOS				B								

HORIZON YEAR (2040) WITHOUT PROJECT CONDITIONS

Timings

1: Barton Rd. & Vivenda Av.

10/24/2017

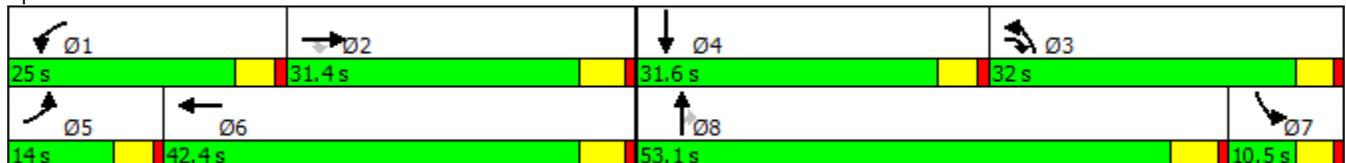


Lane Group	EBL	EBT	EBR	WBL	WBT	NBL	NBT	NBR	SBL	SBT
Lane Configurations	↶	↷	↷	↶	↷	↷	↷	↷	↶	↷
Traffic Volume (vph)	192	848	480	173	1207	896	41	146	21	33
Future Volume (vph)	192	848	480	173	1207	896	41	146	21	33
Turn Type	Prot	NA	pm+ov	Prot	NA	Prot	NA	Perm	Prot	NA
Protected Phases	5	2	3	1	6	3	8		7	4
Permitted Phases			2					8		
Detector Phase	5	2	3	1	6	3	8	8	7	4
Switch Phase										
Minimum Initial (s)	5.0	10.0	5.0	5.0	10.0	5.0	10.0	10.0	5.0	10.0
Minimum Split (s)	9.6	22.2	9.5	9.6	22.2	9.5	32.2	32.2	9.5	31.6
Total Split (s)	14.0	31.4	32.0	25.0	42.4	32.0	53.1	53.1	10.5	31.6
Total Split (%)	11.7%	26.2%	26.7%	20.8%	35.3%	26.7%	44.3%	44.3%	8.8%	26.3%
Yellow Time (s)	3.6	4.2	3.5	3.6	4.2	3.5	4.2	4.2	3.5	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.5	4.6	5.2	4.5	5.2	5.2	4.5	4.6
Lead/Lag	Lead	Lag	Lag	Lead	Lag	Lag	Lead	Lead	Lag	Lead
Lead-Lag Optimize?	Yes	Yes	Yes							
Recall Mode	None	None	None	None	None	None	Min	Min	None	Min

Intersection Summary

Cycle Length: 120
 Actuated Cycle Length: 106.6
 Natural Cycle: 150
 Control Type: Actuated-Uncoordinated

Splits and Phases: 1: Barton Rd. & Vivenda Av.



HCM 2010 Signalized Intersection Summary
 1: Barton Rd. & Vivenda Av.

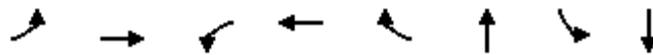
Roquet Ranch SP (JN 09434)

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	192	848	480	173	1207	65	896	41	146	21	33	178
Future Volume (veh/h)	192	848	480	173	1207	65	896	41	146	21	33	178
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1782	1956	1956	1782	1955	1976	1750	1956	1956	1782	1940	1976
Adj Flow Rate, veh/h	202	893	505	182	1271	68	943	126	98	22	35	29
Adj No. of Lanes	1	2	1	1	2	0	2	1	1	1	1	0
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	1	1	1	1	1	1	1	1	1	1	1	1
Cap, veh/h	156	1274	987	211	1319	70	894	191	162	445	96	79
Arrive On Green	0.12	0.44	0.44	0.17	0.48	0.48	0.36	0.13	0.13	0.35	0.13	0.13
Sat Flow, veh/h	1697	3913	1663	1697	3680	197	3334	1956	1663	1697	983	814
Grp Volume(v), veh/h	202	893	505	182	675	664	943	126	98	22	0	64
Grp Sat Flow(s),veh/h/ln	1697	1956	1663	1697	1955	1921	1667	1956	1663	1697	0	1797
Q Serve(g_s), s	9.4	19.0	7.4	10.7	34.2	34.3	27.5	6.3	4.3	0.9	0.0	3.3
Cycle Q Clear(g_c), s	9.4	19.0	7.4	10.7	34.2	34.3	27.5	6.3	4.3	0.9	0.0	3.3
Prop In Lane	1.00		1.00	1.00		0.10	1.00		1.00	1.00		0.45
Lane Grp Cap(c), veh/h	156	1274	987	211	701	688	894	191	162	445	0	175
V/C Ratio(X)	1.30	0.70	0.51	0.86	0.96	0.97	1.05	0.66	0.60	0.05	0.00	0.37
Avail Cap(c_a), veh/h	156	1274	987	338	709	697	894	914	777	445	0	473
HCM Platoon Ratio	1.35	1.35	1.35	1.35	1.35	1.35	1.35	1.35	1.35	1.35	1.35	1.35
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	44.9	24.7	2.9	41.8	25.8	25.8	32.7	42.9	24.4	24.7	0.0	41.6
Incr Delay (d2), s/veh	173.3	1.7	0.4	7.2	24.7	25.5	45.6	3.9	3.6	0.0	0.0	1.3
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	11.8	10.4	3.3	5.4	23.1	22.9	18.1	3.6	2.5	0.4	0.0	1.7
LnGrp Delay(d),s/veh	218.3	26.4	3.3	49.0	50.5	51.4	78.3	46.8	28.0	24.8	0.0	42.9
LnGrp LOS	F	C	A	D	D	D	F	D	C	C		D
Approach Vol, veh/h		1600			1521			1167				86
Approach Delay, s/veh		43.4			50.7			70.7				38.3
Approach LOS		D			D			E				D
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	17.4	38.6	32.0	14.6	14.0	42.0	31.4	15.2				
Change Period (Y+Rc), s	4.6	5.2	4.5	4.6	4.6	5.2	4.5	5.2				
Max Green Setting (Gmax), s	20.4	26.2	27.5	27.0	9.4	37.2	6.0	47.9				
Max Q Clear Time (g_c+I1), s	12.7	21.0	29.5	5.3	11.4	36.3	2.9	8.3				
Green Ext Time (p_c), s	0.1	4.8	0.0	0.3	0.0	0.4	1.3	1.0				
Intersection Summary												
HCM 2010 Ctrl Delay			53.1									
HCM 2010 LOS			D									
Notes												

Timings

2: Driveway/Canal St. & Barton Rd.



Lane Group	EBL	EBT	WBL	WBT	WBR	NBT	SBL	SBT
Lane Configurations								
Traffic Volume (vph)	75	806	1	1082	72	1	137	0
Future Volume (vph)	75	806	1	1082	72	1	137	0
Turn Type	Prot	NA	Prot	NA	Perm	NA	Perm	NA
Protected Phases	5	2	1	6		8		4
Permitted Phases					6		4	
Detector Phase	5	2	1	6	6	8	4	4
Switch Phase								
Minimum Initial (s)	5.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.2	9.6	22.2	22.2	14.6	26.6	26.6
Total Split (s)	9.6	28.8	9.6	28.8	28.8	26.6	26.6	26.6
Total Split (%)	14.8%	44.3%	14.8%	44.3%	44.3%	40.9%	40.9%	40.9%
Yellow Time (s)	3.6	4.2	3.6	4.2	4.2	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.6	5.2	5.2	4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lead	Lag	Lag			
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes			
Recall Mode	None	Max	None	Max	Max	None	None	None

Intersection Summary

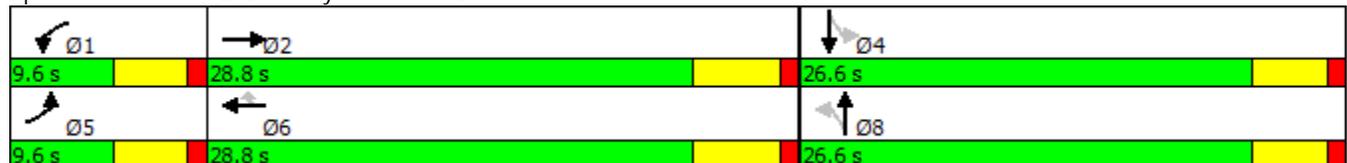
Cycle Length: 65

Actuated Cycle Length: 57.3

Natural Cycle: 65

Control Type: Actuated-Uncoordinated

Splits and Phases: 2: Driveway/Canal St. & Barton Rd.



HCM 2010 Signalized Intersection Summary
 2: Driveway/Canal St. & Barton Rd.

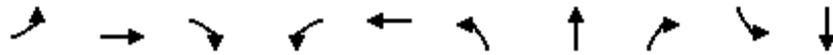
Roquet Ranch SP (JN 09434)

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	75	806	3	1	1082	72	0	1	0	137	0	171
Future Volume (veh/h)	75	806	3	1	1082	72	0	1	0	137	0	171
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1765	1863	1900	1765	1863	1863	1800	1863	1900	1765	1863	1900
Adj Flow Rate, veh/h	79	848	3	1	1139	76	0	1	0	144	0	180
Adj No. of Lanes	1	2	0	1	2	1	0	1	0	1	1	0
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	111	1898	7	3	1629	729	0	360	0	398	0	306
Arrive On Green	0.07	0.52	0.52	0.00	0.46	0.46	0.00	0.19	0.00	0.19	0.00	0.19
Sat Flow, veh/h	1681	3617	13	1681	3539	1583	0	1863	0	1336	0	1583
Grp Volume(v), veh/h	79	415	436	1	1139	76	0	1	0	144	0	180
Grp Sat Flow(s),veh/h/ln	1681	1770	1860	1681	1770	1583	0	1863	0	1336	0	1583
Q Serve(g_s), s	2.4	7.5	7.5	0.0	13.1	1.4	0.0	0.0	0.0	5.0	0.0	5.3
Cycle Q Clear(g_c), s	2.4	7.5	7.5	0.0	13.1	1.4	0.0	0.0	0.0	5.0	0.0	5.3
Prop In Lane	1.00		0.01	1.00		1.00	0.00		0.00	1.00		1.00
Lane Grp Cap(c), veh/h	111	929	976	3	1629	729	0	360	0	398	0	306
V/C Ratio(X)	0.71	0.45	0.45	0.31	0.70	0.10	0.00	0.00	0.00	0.36	0.00	0.59
Avail Cap(c_a), veh/h	164	929	976	164	1629	729	0	799	0	713	0	679
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	23.5	7.6	7.6	25.6	11.0	7.8	0.0	16.7	0.0	18.7	0.0	18.8
Incr Delay (d2), s/veh	3.2	1.6	1.5	18.3	2.5	0.3	0.0	0.0	0.0	0.6	0.0	1.8
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.2	4.0	4.2	0.0	6.9	0.7	0.0	0.0	0.0	1.9	0.0	2.5
LnGrp Delay(d),s/veh	26.7	9.1	9.0	43.8	13.5	8.1	0.0	16.7	0.0	19.3	0.0	20.6
LnGrp LOS	C	A	A	D	B	A		B		B		C
Approach Vol, veh/h		930			1216			1				324
Approach Delay, s/veh		10.6			13.2			16.7				20.0
Approach LOS		B			B			B				C
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	4.7	32.1		14.5	8.0	28.8		14.5				
Change Period (Y+Rc), s	4.6	5.2		4.6	4.6	5.2		4.6				
Max Green Setting (Gmax), s	5.0	23.6		22.0	5.0	23.6		22.0				
Max Q Clear Time (g_c+I1), s	2.0	9.5		7.3	4.4	15.1		2.0				
Green Ext Time (p_c), s	0.0	10.2		1.4	0.0	6.7		1.6				
Intersection Summary												
HCM 2010 Ctrl Delay				13.1								
HCM 2010 LOS				B								

Timings

1: Barton Rd. & Vivenda Av.

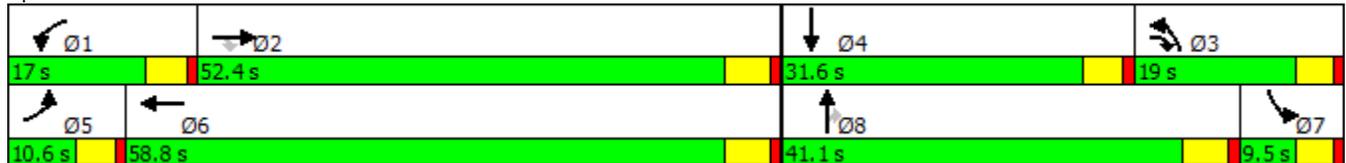


Lane Group	EBL	EBT	EBR	WBL	WBT	NBL	NBT	NBR	SBL	SBT
Lane Configurations										
Traffic Volume (vph)	45	1751	616	259	1469	516	98	281	11	7
Future Volume (vph)	45	1751	616	259	1469	516	98	281	11	7
Turn Type	Prot	NA	pm+ov	Prot	NA	Prot	NA	Perm	Prot	NA
Protected Phases	5	2	3	1	6	3	8		7	4
Permitted Phases			2					8		
Detector Phase	5	2	3	1	6	3	8	8	7	4
Switch Phase										
Minimum Initial (s)	5.0	10.0	5.0	5.0	10.0	5.0	10.0	10.0	5.0	10.0
Minimum Split (s)	9.6	22.2	9.5	9.6	22.2	9.5	32.2	32.2	9.5	31.6
Total Split (s)	10.6	52.4	19.0	17.0	58.8	19.0	41.1	41.1	9.5	31.6
Total Split (%)	8.8%	43.7%	15.8%	14.2%	49.0%	15.8%	34.3%	34.3%	7.9%	26.3%
Yellow Time (s)	3.6	4.2	3.5	3.6	4.2	3.5	4.2	4.2	3.5	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.5	4.6	5.2	4.5	5.2	5.2	4.5	4.6
Lead/Lag	Lead	Lag	Lag	Lead	Lag	Lag	Lead	Lead	Lag	Lead
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Recall Mode	None	None	None	None	None	None	Min	Min	None	Min

Intersection Summary

Cycle Length: 120
 Actuated Cycle Length: 106.4
 Natural Cycle: 150
 Control Type: Actuated-Uncoordinated

Splits and Phases: 1: Barton Rd. & Vivenda Av.



HCM 2010 Signalized Intersection Summary
 1: Barton Rd. & Vivenda Av.

Roquet Ranch SP (JN 09434)

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	45	1751	616	259	1469	23	516	98	281	11	7	27
Future Volume (veh/h)	45	1751	616	259	1469	23	516	98	281	11	7	27
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1782	1956	1937	1782	1956	1976	1750	1956	1956	1782	1937	1976
Adj Flow Rate, veh/h	47	1843	490	273	1546	24	543	208	173	12	7	28
Adj No. of Lanes	1	2	1	1	2	0	2	1	1	1	1	0
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	1	1	2	1	1	1	1	1	1	1	2	2
Cap, veh/h	61	1793	986	204	2085	32	469	268	228	162	33	132
Arrive On Green	0.04	0.57	0.57	0.15	0.68	0.68	0.18	0.17	0.17	0.12	0.12	0.12
Sat Flow, veh/h	1697	3913	1647	1697	3842	60	3334	1956	1663	1697	340	1358
Grp Volume(v), veh/h	47	1843	490	273	786	784	543	208	173	12	0	35
Grp Sat Flow(s),veh/h/ln	1697	1956	1647	1697	1956	1946	1667	1956	1663	1697	0	1698
Q Serve(g_s), s	2.8	47.2	6.4	12.4	26.8	26.9	14.5	10.5	7.7	0.6	0.0	1.9
Cycle Q Clear(g_c), s	2.8	47.2	6.4	12.4	26.8	26.9	14.5	10.5	7.7	0.6	0.0	1.9
Prop In Lane	1.00		1.00	1.00		0.03	1.00		1.00	1.00		0.80
Lane Grp Cap(c), veh/h	61	1793	986	204	1062	1056	469	268	228	162	0	165
V/C Ratio(X)	0.77	1.03	0.50	1.34	0.74	0.74	1.16	0.78	0.76	0.07	0.00	0.21
Avail Cap(c_a), veh/h	99	1793	986	204	1062	1056	469	682	580	162	0	445
HCM Platoon Ratio	1.25	1.25	1.25	1.25	1.25	1.25	1.25	1.25	1.25	1.25	1.25	1.25
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	48.8	22.0	2.6	43.8	11.9	11.9	42.4	41.2	23.1	41.3	0.0	41.7
Incr Delay (d2), s/veh	7.5	28.7	0.4	180.5	2.8	2.9	92.2	4.8	5.2	0.2	0.0	0.6
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.5	32.2	2.8	16.0	14.9	14.8	12.6	6.0	3.8	0.3	0.0	0.9
LnGrp Delay(d),s/veh	56.2	50.7	3.0	224.3	14.7	14.7	134.7	46.0	28.3	41.5	0.0	42.3
LnGrp LOS	E	F	A	F	B	B	F	D	C	D		D
Approach Vol, veh/h		2380			1843			924			47	
Approach Delay, s/veh		41.0			45.8			94.8			42.1	
Approach LOS		D			D			F			D	
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	17.0	52.4	19.0	14.6	8.3	61.1	14.3	19.3				
Change Period (Y+Rc), s	4.6	5.2	4.5	4.6	4.6	5.2	4.5	5.2				
Max Green Setting (Gmax), s	12.4	47.2	14.5	27.0	6.0	53.6	5.0	35.9				
Max Q Clear Time (g_c+I1), s	14.4	49.2	16.5	3.9	4.8	28.9	2.6	12.5				
Green Ext Time (p_c), s	0.0	0.0	0.0	0.1	0.0	23.4	0.5	1.6				
Intersection Summary												
HCM 2010 Ctrl Delay			52.3									
HCM 2010 LOS			D									
Notes												

Timings
2: Driveway/Canal St. & Barton Rd.



Lane Group	EBL	EBT	WBL	WBT	WBR	NBL	NBT	SBL	SBT
Lane Configurations									
Traffic Volume (vph)	148	1709	1	1403	66	9	0	66	0
Future Volume (vph)	148	1709	1	1403	66	9	0	66	0
Turn Type	Prot	NA	Prot	NA	Perm	Perm	NA	Perm	NA
Protected Phases	5	2	1	6			8		4
Permitted Phases					6	8		4	
Detector Phase	5	2	1	6	6	8	8	4	4
Switch Phase									
Minimum Initial (s)	5.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.2	9.6	22.2	22.2	14.6	14.6	26.6	26.6
Total Split (s)	15.0	53.8	9.6	48.4	48.4	26.6	26.6	26.6	26.6
Total Split (%)	16.7%	59.8%	10.7%	53.8%	53.8%	29.6%	29.6%	29.6%	29.6%
Yellow Time (s)	3.6	4.2	3.6	4.2	4.2	3.6	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0		0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.6	5.2	5.2		4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lead	Lag	Lag				
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes				
Recall Mode	None	Max	None	Max	Max	None	None	None	None

Intersection Summary

Cycle Length: 90
 Actuated Cycle Length: 80
 Natural Cycle: 90
 Control Type: Actuated-Uncoordinated

Splits and Phases: 2: Driveway/Canal St. & Barton Rd.



HCM 2010 Signalized Intersection Summary
2: Driveway/Canal St. & Barton Rd.

Roquet Ranch SP (JN 09434)
10/24/2017

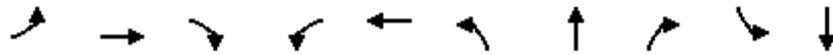
												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	148	1709	1	1	1403	66	9	0	1	66	0	191
Future Volume (veh/h)	148	1709	1	1	1403	66	9	0	1	66	0	191
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1765	1863	1900	1765	1863	1863	1800	1863	1900	1765	1863	1900
Adj Flow Rate, veh/h	151	1744	1	1	1432	67	9	0	1	67	0	195
Adj No. of Lanes	1	2	0	1	2	1	0	1	0	1	1	0
Peak Hour Factor	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	184	2381	1	2	1939	867	133	5	6	336	0	254
Arrive On Green	0.11	0.66	0.66	0.00	0.55	0.55	0.16	0.00	0.16	0.16	0.00	0.16
Sat Flow, veh/h	1681	3630	2	1681	3539	1583	288	29	35	1336	0	1583
Grp Volume(v), veh/h	151	850	895	1	1432	67	10	0	0	67	0	195
Grp Sat Flow(s),veh/h/ln	1681	1770	1862	1681	1770	1583	352	0	0	1336	0	1583
Q Serve(g_s), s	6.9	25.1	25.1	0.0	24.2	1.6	0.3	0.0	0.0	0.0	0.0	9.3
Cycle Q Clear(g_c), s	6.9	25.1	25.1	0.0	24.2	1.6	9.6	0.0	0.0	2.9	0.0	9.3
Prop In Lane	1.00		0.00	1.00		1.00	0.90		0.10	1.00		1.00
Lane Grp Cap(c), veh/h	184	1161	1221	2	1939	867	143	0	0	336	0	254
V/C Ratio(X)	0.82	0.73	0.73	0.43	0.74	0.08	0.07	0.00	0.00	0.20	0.00	0.77
Avail Cap(c_a), veh/h	222	1161	1221	107	1939	867	287	0	0	495	0	442
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	34.4	9.0	9.0	39.3	13.5	8.4	31.5	0.0	0.0	29.0	0.0	31.7
Incr Delay (d2), s/veh	15.5	4.1	3.9	41.2	2.6	0.2	0.2	0.0	0.0	0.3	0.0	4.9
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.0	13.4	14.0	0.0	12.4	0.7	0.2	0.0	0.0	1.3	0.0	4.4
LnGrp Delay(d),s/veh	49.9	13.1	12.9	80.5	16.1	8.6	31.7	0.0	0.0	29.3	0.0	36.6
LnGrp LOS	D	B	B	F	B	A	C			C		D
Approach Vol, veh/h		1896			1500			10				262
Approach Delay, s/veh		15.9			15.8			31.7				34.7
Approach LOS		B			B			C				C
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	4.7	56.9		17.2	13.2	48.4		17.2				
Change Period (Y+Rc), s	4.6	5.2		4.6	4.6	5.2		4.6				
Max Green Setting (Gmax), s	5.0	48.6		22.0	10.4	43.2		22.0				
Max Q Clear Time (g_c+I1), s	2.0	27.1		11.3	8.9	26.2		11.6				
Green Ext Time (p_c), s	0.0	19.6		1.1	0.0	15.7		1.1				
Intersection Summary												
HCM 2010 Ctrl Delay				17.3								
HCM 2010 LOS				B								

HORIZON YEAR (2040) WITH PROJECT CONDITIONS

Timings

1: Barton Rd. & Vivenda Av.

10/24/2017

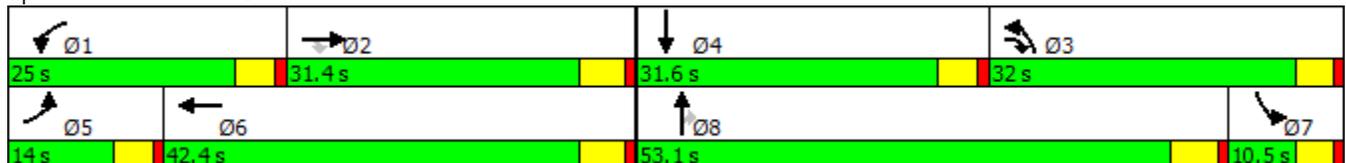


Lane Group	EBL	EBT	EBR	WBL	WBT	NBL	NBT	NBR	SBL	SBT
Lane Configurations	↖	↗	↘	↖	↗	↖	↗	↘	↖	↗
Traffic Volume (vph)	192	915	480	173	1236	896	41	146	21	33
Future Volume (vph)	192	915	480	173	1236	896	41	146	21	33
Turn Type	Prot	NA	pm+ov	Prot	NA	Prot	NA	Perm	Prot	NA
Protected Phases	5	2	3	1	6	3	8		7	4
Permitted Phases			2					8		
Detector Phase	5	2	3	1	6	3	8	8	7	4
Switch Phase										
Minimum Initial (s)	5.0	10.0	5.0	5.0	10.0	5.0	10.0	10.0	5.0	10.0
Minimum Split (s)	9.6	22.2	9.5	9.6	22.2	9.5	32.2	32.2	9.5	31.6
Total Split (s)	14.0	31.4	32.0	25.0	42.4	32.0	53.1	53.1	10.5	31.6
Total Split (%)	11.7%	26.2%	26.7%	20.8%	35.3%	26.7%	44.3%	44.3%	8.8%	26.3%
Yellow Time (s)	3.6	4.2	3.5	3.6	4.2	3.5	4.2	4.2	3.5	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.5	4.6	5.2	4.5	5.2	5.2	4.5	4.6
Lead/Lag	Lead	Lag	Lag	Lead	Lag	Lag	Lead	Lead	Lag	Lead
Lead-Lag Optimize?	Yes	Yes	Yes							
Recall Mode	None	None	None	None	None	None	Min	Min	None	Min

Intersection Summary

Cycle Length: 120
 Actuated Cycle Length: 106.6
 Natural Cycle: 150
 Control Type: Actuated-Uncoordinated

Splits and Phases: 1: Barton Rd. & Vivenda Av.



HCM 2010 Signalized Intersection Summary
 1: Barton Rd. & Vivenda Av.

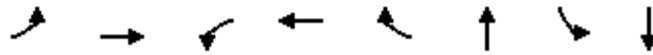
Roquet Ranch SP (JN 09434)

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	192	915	480	173	1236	65	896	41	146	21	33	178
Future Volume (veh/h)	192	915	480	173	1236	65	896	41	146	21	33	178
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1782	1956	1956	1782	1955	1976	1750	1956	1956	1782	1940	1976
Adj Flow Rate, veh/h	202	963	505	182	1301	68	943	126	98	22	35	29
Adj No. of Lanes	1	2	1	1	2	0	2	1	1	1	1	0
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	1	1	1	1	1	1	1	1	1	1	1	1
Cap, veh/h	155	1284	989	211	1331	69	890	190	161	443	95	79
Arrive On Green	0.12	0.44	0.44	0.17	0.49	0.49	0.36	0.13	0.13	0.35	0.13	0.13
Sat Flow, veh/h	1697	3913	1663	1697	3685	192	3334	1956	1663	1697	983	814
Grp Volume(v), veh/h	202	963	505	182	690	679	943	126	98	22	0	64
Grp Sat Flow(s),veh/h/ln	1697	1956	1663	1697	1955	1922	1667	1956	1663	1697	0	1797
Q Serve(g_s), s	9.4	21.2	7.4	10.7	35.5	35.7	27.5	6.3	4.3	0.9	0.0	3.3
Cycle Q Clear(g_c), s	9.4	21.2	7.4	10.7	35.5	35.7	27.5	6.3	4.3	0.9	0.0	3.3
Prop In Lane	1.00		1.00	1.00		0.10	1.00		1.00	1.00		0.45
Lane Grp Cap(c), veh/h	155	1284	989	211	706	694	890	190	161	443	0	174
V/C Ratio(X)	1.30	0.75	0.51	0.86	0.98	0.98	1.06	0.66	0.61	0.05	0.00	0.37
Avail Cap(c_a), veh/h	155	1284	989	336	706	694	890	910	773	443	0	471
HCM Platoon Ratio	1.35	1.35	1.35	1.35	1.35	1.35	1.35	1.35	1.35	1.35	1.35	1.35
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	45.2	25.2	2.9	42.0	26.0	26.0	32.9	43.1	24.6	24.9	0.0	41.9
Incr Delay (d2), s/veh	175.7	2.5	0.4	7.4	27.9	28.9	47.1	3.9	3.6	0.0	0.0	1.3
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	11.9	11.7	3.3	5.4	24.4	24.2	18.4	3.6	2.2	0.4	0.0	1.7
LnGrp Delay(d),s/veh	220.8	27.7	3.3	49.4	53.9	54.9	80.1	47.1	28.2	25.0	0.0	43.1
LnGrp LOS	F	C	A	D	D	D	F	D	C	C		D
Approach Vol, veh/h		1670			1551			1167				86
Approach Delay, s/veh		43.7			53.8			72.2				38.5
Approach LOS		D			D			E				D
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	17.4	39.0	32.0	14.6	14.0	42.4	31.4	15.2				
Change Period (Y+Rc), s	4.6	5.2	4.5	4.6	4.6	5.2	4.5	5.2				
Max Green Setting (Gmax), s	20.4	26.2	27.5	27.0	9.4	37.2	6.0	47.9				
Max Q Clear Time (g_c+I1), s	12.7	23.2	29.5	5.3	11.4	37.7	2.9	8.3				
Green Ext Time (p_c), s	0.1	2.9	0.0	0.3	0.0	0.0	1.3	1.0				
Intersection Summary												
HCM 2010 Ctrl Delay			54.5									
HCM 2010 LOS			D									
Notes												

Timings

2: Driveway/Canal St. & Barton Rd.



Lane Group	EBL	EBT	WBL	WBT	WBR	NBT	SBL	SBT
Lane Configurations								
Traffic Volume (vph)	75	873	1	1111	72	1	137	0
Future Volume (vph)	75	873	1	1111	72	1	137	0
Turn Type	Prot	NA	Prot	NA	Perm	NA	Perm	NA
Protected Phases	5	2	1	6		8		4
Permitted Phases					6		4	
Detector Phase	5	2	1	6	6	8	4	4
Switch Phase								
Minimum Initial (s)	5.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.2	9.6	22.2	22.2	14.6	26.6	26.6
Total Split (s)	9.6	28.8	9.6	28.8	28.8	26.6	26.6	26.6
Total Split (%)	14.8%	44.3%	14.8%	44.3%	44.3%	40.9%	40.9%	40.9%
Yellow Time (s)	3.6	4.2	3.6	4.2	4.2	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.6	5.2	5.2	4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lead	Lag	Lag			
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes			
Recall Mode	None	Max	None	Max	Max	None	None	None

Intersection Summary

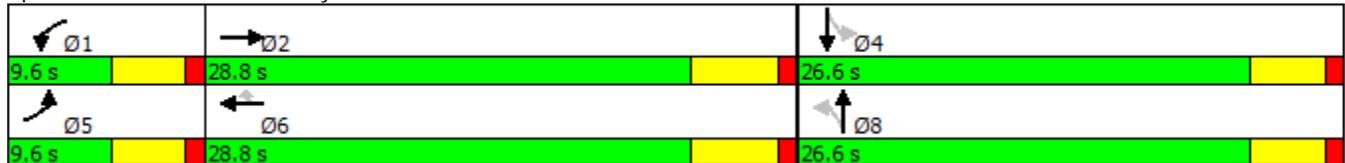
Cycle Length: 65

Actuated Cycle Length: 57.3

Natural Cycle: 65

Control Type: Actuated-Uncoordinated

Splits and Phases: 2: Driveway/Canal St. & Barton Rd.



HCM 2010 Signalized Intersection Summary
 2: Driveway/Canal St. & Barton Rd.

Roquet Ranch SP (JN 09434)

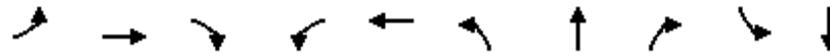
10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	75	873	3	1	1111	72	0	1	0	137	0	171
Future Volume (veh/h)	75	873	3	1	1111	72	0	1	0	137	0	171
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1765	1863	1900	1765	1863	1863	1800	1863	1900	1765	1863	1900
Adj Flow Rate, veh/h	79	919	3	1	1169	76	0	1	0	144	0	180
Adj No. of Lanes	1	2	0	1	2	1	0	1	0	1	1	0
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	111	1899	6	3	1629	729	0	360	0	398	0	306
Arrive On Green	0.07	0.52	0.52	0.00	0.46	0.46	0.00	0.19	0.00	0.19	0.00	0.19
Sat Flow, veh/h	1681	3618	12	1681	3539	1583	0	1863	0	1336	0	1583
Grp Volume(v), veh/h	79	449	473	1	1169	76	0	1	0	144	0	180
Grp Sat Flow(s),veh/h/ln	1681	1770	1861	1681	1770	1583	0	1863	0	1336	0	1583
Q Serve(g_s), s	2.4	8.3	8.3	0.0	13.7	1.4	0.0	0.0	0.0	5.0	0.0	5.3
Cycle Q Clear(g_c), s	2.4	8.3	8.3	0.0	13.7	1.4	0.0	0.0	0.0	5.0	0.0	5.3
Prop In Lane	1.00		0.01	1.00		1.00	0.00		0.00	1.00		1.00
Lane Grp Cap(c), veh/h	111	929	976	3	1629	729	0	360	0	398	0	306
V/C Ratio(X)	0.71	0.48	0.48	0.31	0.72	0.10	0.00	0.00	0.00	0.36	0.00	0.59
Avail Cap(c_a), veh/h	164	929	976	164	1629	729	0	799	0	713	0	679
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	23.5	7.8	7.8	25.6	11.2	7.8	0.0	16.7	0.0	18.7	0.0	18.8
Incr Delay (d2), s/veh	3.2	1.8	1.7	18.3	2.7	0.3	0.0	0.0	0.0	0.6	0.0	1.8
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.2	4.5	4.7	0.0	7.1	0.7	0.0	0.0	0.0	1.9	0.0	2.5
LnGrp Delay(d),s/veh	26.7	9.6	9.5	43.8	13.9	8.1	0.0	16.7	0.0	19.3	0.0	20.6
LnGrp LOS	C	A	A	D	B	A		B		B		C
Approach Vol, veh/h		1001			1246			1				324
Approach Delay, s/veh		10.9			13.6			16.7				20.0
Approach LOS		B			B			B				C
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	4.7	32.1		14.5	8.0	28.8		14.5				
Change Period (Y+Rc), s	4.6	5.2		4.6	4.6	5.2		4.6				
Max Green Setting (Gmax), s	5.0	23.6		22.0	5.0	23.6		22.0				
Max Q Clear Time (g_c+I1), s	2.0	10.3		7.3	4.4	15.7		2.0				
Green Ext Time (p_c), s	0.0	10.1		1.4	0.0	6.5		1.6				
Intersection Summary												
HCM 2010 Ctrl Delay				13.3								
HCM 2010 LOS				B								

Timings
1: Barton Rd. & Vivenda Av.

Roquet Ranch SP (JN 09434)

10/24/2017

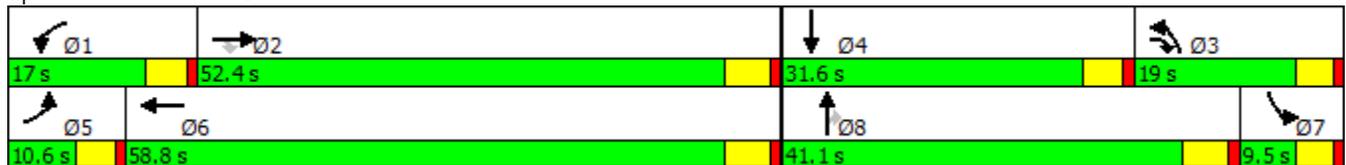


Lane Group	EBL	EBT	EBR	WBL	WBT	NBL	NBT	NBR	SBL	SBT
Lane Configurations	↘	↑↑	↗	↘	↑↑	↗	↑	↗	↘	↑
Traffic Volume (vph)	45	1796	616	259	1544	516	98	281	11	7
Future Volume (vph)	45	1796	616	259	1544	516	98	281	11	7
Turn Type	Prot	NA	pm+ov	Prot	NA	Prot	NA	Perm	Prot	NA
Protected Phases	5	2	3	1	6	3	8		7	4
Permitted Phases			2					8		
Detector Phase	5	2	3	1	6	3	8	8	7	4
Switch Phase										
Minimum Initial (s)	5.0	10.0	5.0	5.0	10.0	5.0	10.0	10.0	5.0	10.0
Minimum Split (s)	9.6	22.2	9.5	9.6	22.2	9.5	32.2	32.2	9.5	31.6
Total Split (s)	10.6	52.4	19.0	17.0	58.8	19.0	41.1	41.1	9.5	31.6
Total Split (%)	8.8%	43.7%	15.8%	14.2%	49.0%	15.8%	34.3%	34.3%	7.9%	26.3%
Yellow Time (s)	3.6	4.2	3.5	3.6	4.2	3.5	4.2	4.2	3.5	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.5	4.6	5.2	4.5	5.2	5.2	4.5	4.6
Lead/Lag	Lead	Lag	Lag	Lead	Lag	Lag	Lead	Lead	Lag	Lead
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Recall Mode	None	None	None	None	None	None	Min	Min	None	Min

Intersection Summary

Cycle Length: 120
 Actuated Cycle Length: 106.4
 Natural Cycle: 150
 Control Type: Actuated-Uncoordinated

Splits and Phases: 1: Barton Rd. & Vivenda Av.



HCM 2010 Signalized Intersection Summary
 1: Barton Rd. & Vivenda Av.

Roquet Ranch SP (JN 09434)

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	45	1796	616	259	1544	23	516	98	281	11	7	27
Future Volume (veh/h)	45	1796	616	259	1544	23	516	98	281	11	7	27
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1782	1956	1956	1782	1956	1976	1750	1956	1956	1782	1941	1976
Adj Flow Rate, veh/h	47	1891	490	273	1625	24	543	208	173	12	7	28
Adj No. of Lanes	1	2	1	1	2	0	2	1	1	1	1	0
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	1	1	1	1	1	1	1	1	1	1	1	1
Cap, veh/h	61	1793	996	204	2087	31	469	267	227	162	33	132
Arrive On Green	0.05	0.60	0.60	0.16	0.71	0.71	0.18	0.18	0.18	0.12	0.13	0.13
Sat Flow, veh/h	1697	3913	1663	1697	3846	57	3334	1956	1663	1697	340	1361
Grp Volume(v), veh/h	47	1891	490	273	826	823	543	208	173	12	0	35
Grp Sat Flow(s),veh/h/ln	1697	1956	1663	1697	1956	1946	1667	1956	1663	1697	0	1701
Q Serve(g_s), s	2.8	47.2	6.1	12.4	28.4	28.5	14.5	10.4	7.6	0.6	0.0	1.9
Cycle Q Clear(g_c), s	2.8	47.2	6.1	12.4	28.4	28.5	14.5	10.4	7.6	0.6	0.0	1.9
Prop In Lane	1.00		1.00	1.00		0.03	1.00		1.00	1.00		0.80
Lane Grp Cap(c), veh/h	61	1793	996	204	1062	1056	469	267	227	162	0	165
V/C Ratio(X)	0.77	1.05	0.49	1.34	0.78	0.78	1.16	0.78	0.76	0.07	0.00	0.21
Avail Cap(c_a), veh/h	99	1793	996	204	1062	1056	469	682	580	162	0	446
HCM Platoon Ratio	1.30	1.30	1.30	1.30	1.30	1.30	1.30	1.30	1.30	1.30	1.30	1.30
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	48.7	20.8	2.4	43.4	11.1	11.1	42.1	40.9	22.9	41.1	0.0	41.5
Incr Delay (d2), s/veh	7.5	37.3	0.4	180.5	3.7	3.8	92.2	4.9	5.2	0.2	0.0	0.6
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.5	34.3	2.7	16.0	16.1	16.0	12.6	6.0	3.8	0.3	0.0	0.9
LnGrp Delay(d),s/veh	56.1	58.2	2.8	224.0	14.8	14.9	134.3	45.7	28.1	41.3	0.0	42.1
LnGrp LOS	E	F	A	F	B	B	F	D	C	D		D
Approach Vol, veh/h		2428			1922			924				47
Approach Delay, s/veh		46.9			44.6			94.5				41.9
Approach LOS		D			D			F				D
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	17.0	52.4	19.0	14.6	8.3	61.1	14.3	19.3				
Change Period (Y+Rc), s	4.6	5.2	4.5	4.6	4.6	5.2	4.5	5.2				
Max Green Setting (Gmax), s	12.4	47.2	14.5	27.0	6.0	53.6	5.0	35.9				
Max Q Clear Time (g_c+I1), s	14.4	49.2	16.5	3.9	4.8	30.5	2.6	12.4				
Green Ext Time (p_c), s	0.0	0.0	0.0	0.1	0.0	22.1	0.5	1.6				
Intersection Summary												
HCM 2010 Ctrl Delay			54.3									
HCM 2010 LOS			D									
Notes												

Timings
2: Driveway/Canal St. & Barton Rd.

Roquet Ranch SP (JN 09434)

10/24/2017



Lane Group	EBL	EBT	WBL	WBT	WBR	NBL	NBT	SBL	SBT
Lane Configurations									
Traffic Volume (vph)	148	1754	1	1478	66	9	0	66	0
Future Volume (vph)	148	1754	1	1478	66	9	0	66	0
Turn Type	Prot	NA	Prot	NA	Perm	Perm	NA	Perm	NA
Protected Phases	5	2	1	6			8		4
Permitted Phases					6	8		4	
Detector Phase	5	2	1	6	6	8	8	4	4
Switch Phase									
Minimum Initial (s)	5.0	10.0	5.0	10.0	10.0	10.0	10.0	10.0	10.0
Minimum Split (s)	9.6	22.2	9.6	22.2	22.2	14.6	14.6	26.6	26.6
Total Split (s)	15.0	53.8	9.6	48.4	48.4	26.6	26.6	26.6	26.6
Total Split (%)	16.7%	59.8%	10.7%	53.8%	53.8%	29.6%	29.6%	29.6%	29.6%
Yellow Time (s)	3.6	4.2	3.6	4.2	4.2	3.6	3.6	3.6	3.6
All-Red Time (s)	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Lost Time Adjust (s)	0.0	0.0	0.0	0.0	0.0		0.0	0.0	0.0
Total Lost Time (s)	4.6	5.2	4.6	5.2	5.2		4.6	4.6	4.6
Lead/Lag	Lead	Lag	Lead	Lag	Lag				
Lead-Lag Optimize?	Yes	Yes	Yes	Yes	Yes				
Recall Mode	None	Max	None	Max	Max	None	None	None	None

Intersection Summary

Cycle Length: 90

Actuated Cycle Length: 80

Natural Cycle: 90

Control Type: Actuated-Uncoordinated

Splits and Phases: 2: Driveway/Canal St. & Barton Rd.



HCM 2010 Signalized Intersection Summary
2: Driveway/Canal St. & Barton Rd.

Roquet Ranch SP (JN 09434)

10/24/2017

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		 			 			 				
Traffic Volume (veh/h)	148	1754	1	1	1478	66	9	0	1	66	0	191
Future Volume (veh/h)	148	1754	1	1	1478	66	9	0	1	66	0	191
Number	5	2	12	1	6	16	3	8	18	7	4	14
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Adj Sat Flow, veh/h/ln	1765	1863	1900	1765	1863	1863	1800	1863	1900	1765	1863	1900
Adj Flow Rate, veh/h	151	1790	1	1	1508	67	9	0	1	67	0	195
Adj No. of Lanes	1	2	0	1	2	1	0	1	0	1	1	0
Peak Hour Factor	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98	0.98
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	184	2381	1	2	1939	867	133	5	6	336	0	254
Arrive On Green	0.11	0.66	0.66	0.00	0.55	0.55	0.16	0.00	0.16	0.16	0.00	0.16
Sat Flow, veh/h	1681	3630	2	1681	3539	1583	288	29	35	1336	0	1583
Grp Volume(v), veh/h	151	873	918	1	1508	67	10	0	0	67	0	195
Grp Sat Flow(s),veh/h/ln	1681	1770	1862	1681	1770	1583	352	0	0	1336	0	1583
Q Serve(g_s), s	6.9	26.4	26.4	0.0	26.5	1.6	0.3	0.0	0.0	0.0	0.0	9.3
Cycle Q Clear(g_c), s	6.9	26.4	26.4	0.0	26.5	1.6	9.6	0.0	0.0	2.9	0.0	9.3
Prop In Lane	1.00		0.00	1.00		1.00	0.90		0.10	1.00		1.00
Lane Grp Cap(c), veh/h	184	1161	1221	2	1939	867	143	0	0	336	0	254
V/C Ratio(X)	0.82	0.75	0.75	0.43	0.78	0.08	0.07	0.00	0.00	0.20	0.00	0.77
Avail Cap(c_a), veh/h	222	1161	1221	107	1939	867	287	0	0	495	0	442
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	0.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	34.4	9.2	9.2	39.3	14.1	8.4	31.5	0.0	0.0	29.0	0.0	31.7
Incr Delay (d2), s/veh	15.5	4.5	4.3	41.2	3.2	0.2	0.2	0.0	0.0	0.3	0.0	4.9
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.0	14.1	14.7	0.0	13.6	0.7	0.2	0.0	0.0	1.3	0.0	4.4
LnGrp Delay(d),s/veh	49.9	13.7	13.5	80.5	17.2	8.6	31.7	0.0	0.0	29.3	0.0	36.6
LnGrp LOS	D	B	B	F	B	A	C			C		D
Approach Vol, veh/h		1942			1576			10				262
Approach Delay, s/veh		16.4			16.9			31.7				34.7
Approach LOS		B			B			C				C
Timer	1	2	3	4	5	6	7	8				
Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	4.7	56.9		17.2	13.2	48.4		17.2				
Change Period (Y+Rc), s	4.6	5.2		4.6	4.6	5.2		4.6				
Max Green Setting (Gmax), s	5.0	48.6		22.0	10.4	43.2		22.0				
Max Q Clear Time (g_c+I1), s	2.0	28.4		11.3	8.9	28.5		11.6				
Green Ext Time (p_c), s	0.0	18.8		1.1	0.0	13.9		1.1				
Intersection Summary												
HCM 2010 Ctrl Delay				17.9								
HCM 2010 LOS				B								



ATTACHMENT B
SUPPLEMENTARY OPERATIONAL NOISE SOURCES FIGURE INSET



LEGEND:

- Receiver Locations
- Parking Lot Vehicle Movements
- Roof-Top Air Conditioning Unit
- Park/School Athletic Field Activity
- Drive-Through Speakerphone
- Distance from receiver to center of noise source (in feet)





ATTACHMENT C

FIGURE 1 – 1888 IRRIGATION MAP

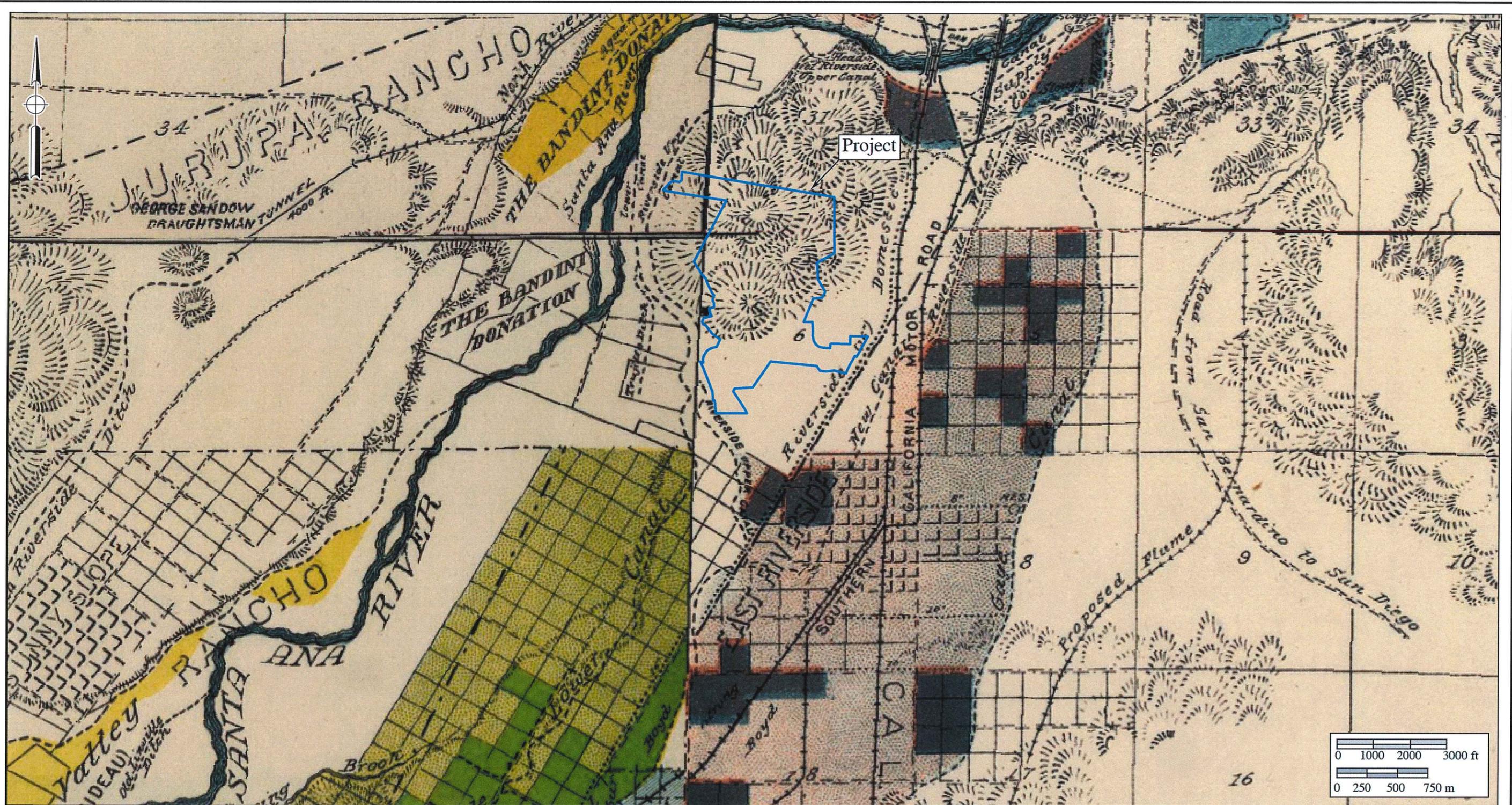


Figure 1

1888 Irrigation Map
The Roquet Ranch Project

(Lithograph courtesy of the David Rumsey Historical Map Collection)





ATTACHMENT D
PROJECT TRIP GENERATION (ELEMENTARY SCHOOL SCENARIO)

Table 4-2 (2)

Project Trip Generation Summary

Planning Area	Land Use	Quantity	Units ¹	AM Peak Hour			PM Peak Hour			Daily
				In	Out	Total	In	Out	Total	
1	Single Family Residential	65	DU	12	36	49	41	24	65	619
2	Single Family Residential	121	DU	23	68	91	76	45	121	1,152
3	Single Family Residential	169	DU	32	95	127	106	63	169	1,609
4	Single Family Residential	78	DU	15	44	59	49	29	78	743
5	Single Family Residential	75	DU	14	42	56	47	28	75	714
6	Single Family Residential	78	DU	15	44	59	49	29	78	743
7	Single Family Residential	20	DU	4	11	15	13	7	20	190
8	Condo/Townhomes	79	DU	6	29	35	28	13	41	459
9	Single Family Residential	137	DU	26	77	103	86	51	137	1,304
10	Active Adult - Attached	52	DU	4	7	10	7	6	13	179
12	Elementary School	600	STU	150	120	270	42	48	90	774
13	Single Family Residential	11	DU	2	6	8	7	4	11	105
Residential Net Trips				302	578	881	552	346	898	8,590
<i>Internal Capture (Residential to Retail)</i> ²				-8	-37	-45	-28	-18	-46	-440
<i>Internal Capture (School to Residential)</i>				-75	-60	-135	-21	-24	-45	-387
Residential Subtotal				219	481	701	503	304	807	7,763
11	Shopping Center	6.500	TSF	16	10	25	41	44	85	1,006
	<i>Internal Capture</i> ²			-4	-2	-6	-25	-24	-49	-583
	<i>Pass-By Reduction</i> ³		34%	--	--	--	-5	-5	-11	-342
	Coffee Shop with Drive Thru	1.500	TSF	77	74	151	32	32	64	1,228
	<i>Internal Capture</i> ²			-18	-4	-22	-14	-19	-33	-622
	<i>Pass-By Reduction</i> ³		49/50%	-34	-34	-69	-7	-7	-13	-303
	Fast Food with Drive Thru	4.000	TSF	93	89	182	68	63	131	1,984
	<i>Internal Capture</i> ²			-18	-4	-22	-14	-19	-33	-494
	<i>Pass-By Reduction</i> ³		49/50%	-42	-42	-83	-22	-22	-44	-745
	Planning Area 11 Net Trips				185	173	358	141	139	279
<i>Total Internal Capture</i>				-39	-10	-49	-52	-62	-114	-1,698
<i>Total Pass-by Reduction</i>				-76	-76	-152	-34	-34	-67	-1,391
Planning Area 11 Subtotal				70	87	157	55	43	98	1,130
13B	Community Park ⁵	11.1	AC	11	11	22	22	22	44	555
15, 16, 17, 18, 19	Passive Parks	8.4	AC	1	1	2	1	1	1	13
Total				302	580	882	581	370	951	9,461

¹ TSF = thousand square feet; DU = Dwelling Units; STU = Students; AC = Acres² Internal capture calculated from NCHRP 684 Internal Trip Capture Estimation Tool.³ Pass-by reduction percentages based on Tables F.9, F.31, F.32 from ITE Trip Generation Handbook, 3rd Edition, August 2014.⁴ Planning Area 12 has an alternative overlay for a 10-acre school. For the purpose of this study, the more conservative trip generation has been evaluated (i.e. 165 condo/townhomes).⁵ Community Park totals 13.9 acres, however 2.8 acres are intended for residential amenities, such as clubhouse and pool, and have not been included as it will only generate internal trips.